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Transcript of Nate Moll

Date: March 9, 2022

Case: Krasno -v- Board of Regents of University of Wisconsin, et al.

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Conducted on March 9, 2022

1 (1 to 4)

1	IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF WISCONSIN MADELINE KRASNO, Plaintiff, vs. BOARD OF REGENTS OF THE UNIVERSITY OF WISCONSIN, et al. Defendants. VIDEOTAPED DEPOSITION OF NATE MOLL Conducted Virtually Wednesday, March 9, 2021 10:00 a.m. CST Reporter: Angela C. Loisi, CSR, RPR, FCRR License No.: 084-004571 APPEARING REMOTELY FROM COOK COUNTY, ILLINOIS JOB NUMBER: 434745	3
2	INDEX WITNESS: NATE MOLL Examination by Mr. Berry Examination by Mr. Kilpatrick NATE MOLL Exhibit No. 20 Exhibit No. 21 Exhibit No. 22 Exhibit No. 23 Exhibit No. 24 Exhibit No. 25 Exhibit No. 26 Exhibit No. 27 Exhibit No. 28 Exhibit No. 29 Exhibit No. 30 Exhibit No. 31 Exhibit No. 32 Exhibit No. 33 Exhibit No. 34 Exhibit No. 35 Exhibit No. 36 Exhibit No. 37 Exhibit No. 38 Exhibit No. 39 Exhibit No. 40	4
2	VIRTUAL APPEARANCES: ANIMAL LEGAL DEFENSE FUND BY: MR. CHRISTOPHER BERRY MS. CAITLIN FOLEY MS. JESSICA FARLEY 150 South Wacker Drive, Suite 2400 Chicago, Illinois 60606 (312) 795-2533 Cberry@aldf.org Cfoley@aldf.org Jfarley@aldf.org Representing the Plaintiff; WISCONSIN DEPARTMENT OF JUSTICE BY: MR. STEVEN C. KILPATRICK 17 West Main Street, PO Box 7857 Madison, Wisconsin 53707-7857 (608) 266-1792 Kilpatricksc@doj.state.wi.us Representing the Defendants. ALSO PRESENT: Craig Fischer, in-house counsel; Emily Dunn, technician; RJ Buckler, videographer; Madeline Krasno; Rachel Jeris.	4

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2 (5 to 8)

<p>5</p> <p>1 number 21-CV-00099-SLC. 2 Today's date is March 9, 2022. The 3 time on the video monitor is 10:05 a.m. 4 central U.S. time. The videographer today is 5 RJ Buckler, CVLS, representing Planet Depos. 6 This video deposition is taking place remotely 7 via Zoom. 8 Would counsel please voice identify 9 themselves and state whom they represent. 10 MR. BERRY: I am -- excuse me. 11 My name's Christopher Berry. I'm with 12 the Animal Legal Defense Fund representing 13 Plaintiff Madeline Krasno. 14 MR. KILPATRICK: I am assistant 15 Attorney General with the Wisconsin Department 16 of Justice, Steven Kilpatrick, representing 17 the defendants. 18 MS. FOLEY: Caitlin Foley with 19 Plaintiff Madeline Krasno. 20 MS. FARLEY: Jessica Farley on behalf 21 of Plaintiff Madeline Krasno. 22 MR. FISCHER: Craig Fischer on behalf 23 of Board of Regents. 24 VIDEOGRAPHER: The court reporter 25 today is Angela Loisi representing Planet</p>	<p>7</p> <p>1 WHEREUPON: 2 NATE MOLL, 3 called as a witness herein, acknowledged their 4 testimony to be true under penalties of 5 perjury, was examined and testified as 6 follows: 7 EXAMINATION 8 BY MR. BERRY: 9 Q. All right. Good morning, Mr. Moll. 10 My name's Christopher Berry and I represent 11 the plaintiff, Madeline Krasno in the lawsuit. 12 What -- how would you prefer to be 13 called? 14 A. Yeah. Good morning. My name is Nate. 15 You can either -- my full name is Nathan, but 16 you can either refer to me as Nate or 17 Mr. Moll, pronounced mall, like shopping mall, 18 but with an "O." 19 Q. Okay. And can you spell your first 20 and last names for the record? 21 A. Yes. First name is Nate, N-A-T-E. 22 Last name Moll, M-O-L-L. 23 Q. And do you use any other names? 24 A. My legal first name is Nathan, 25 N-A-T-H-A-N. But I prefer to go by Nate.</p>
<p>6</p> <p>1 Depos. 2 Would the court reporter please swear 3 in the witness. 4 STENOGRAPHER: Will counsel please 5 stipulate that in lieu of formally swearing in 6 the witness, the reporter will instead ask the 7 witness to acknowledge that their testimony 8 will be true under the penalties of perjury, 9 that counsel will not object to the 10 admissibility of the transcript based on 11 proceeding in this way, and that the witness 12 has verified that they are, in fact, Nate 13 Moll. 14 MR. KILPATRICK: I agree. 15 MR. BERRY: I agree to that as well. 16 STENOGRAPHER: Thank you. 17 And, Mr. Moll, do you hereby 18 acknowledge that your testimony will be true 19 under the penalties of perjury? 20 THE WITNESS: I do. 21 STENOGRAPHER: Thank you. Please, go 22 ahead. 23 24 25</p>	<p>8</p> <p>1 Q. Okay. And you work for the University 2 of Wisconsin; correct? 3 A. Correct. University of 4 Wisconsin-Madison. 5 Q. And what's your position for the 6 University of Wisconsin-Madison? 7 A. Yeah. I work as the social media 8 manager in university communications. 9 Q. Have you ever been deposed before? 10 A. No. 11 Q. Have you ever testified in a legal 12 matter before in any way? 13 A. No. 14 Q. And -- and I'm -- let's see here. 15 I guess that you -- you may have met 16 with your attorney and talked about some of 17 what this is going to be like. But I want to 18 go over the form -- the format of the 19 deposition so we have an understanding of how 20 it will go. So that will just take a few 21 minutes here. 22 I'm here today to ask questions and 23 I'd ask that you answer them to the best of 24 your ability and your recollection. Do you 25 understand that?</p>

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3 (9 to 12)

<p>9</p> <p>1 A. Yes, I do.</p> <p>2 Q. And if I ask you a question and you</p> <p>3 don't understand, please let me know and I'll</p> <p>4 do my best to clarify the question. Do you</p> <p>5 understand that?</p> <p>6 A. Yes.</p> <p>7 Q. Additionally, if you don't ask for</p> <p>8 clarification, I'll assume that you understood</p> <p>9 the question and -- does that make sense?</p> <p>10 A. Yes, it does.</p> <p>11 Q. I'll do my best to take regular breaks</p> <p>12 during the deposition, but if you feel like</p> <p>13 you need a break, please let me know and we</p> <p>14 can take one.</p> <p>15 I would only ask that if the question</p> <p>16 is pending that you answer that question</p> <p>17 before we take a break. Do you understand</p> <p>18 that?</p> <p>19 A. Yes, I do. Thank you.</p> <p>20 Q. If at any point during today's</p> <p>21 deposition you realize that an answer that you</p> <p>22 gave earlier was inaccurate or maybe</p> <p>23 incomplete, or you just wish to elaborate on</p> <p>24 it, just let me know and I'll give you the</p> <p>25 opportunity to do that. Is that okay?</p>	<p>11</p> <p>1 A. Yes, I do.</p> <p>2 Q. I'm also going to refer to the</p> <p>3 university social media accounts, in</p> <p>4 particular, the Instagram account and the</p> <p>5 Facebook account operated under the handle</p> <p>6 @UW-Madison.</p> <p>7 Can we agree that when we're talking</p> <p>8 about the university social media accounts,</p> <p>9 we're referring to the @UW-Madison Instagram,</p> <p>10 Facebook accounts as opposed to other social</p> <p>11 media account pages by other departments?</p> <p>12 A. Yes. That's fine.</p> <p>13 Q. Okay.</p> <p>14 A. Unless otherwise stated, you know, or</p> <p>15 clarified.</p> <p>16 Q. Okay. Great, yeah. But it can --</p> <p>17 okay.</p> <p>18 I'd like to talk about your -- your</p> <p>19 experience in your job a little bit here.</p> <p>20 How -- you said you're a social media</p> <p>21 specialist for the university?</p> <p>22 A. Yes.</p> <p>23 Q. And that's the -- that's -- the title</p> <p>24 is social media specialist?</p> <p>25 A. Yes. We recently went through a title</p>
<p>10</p> <p>1 A. Yes, it is.</p> <p>2 Q. And I'd also ask that since the</p> <p>3 deposition's being recorded by a reporter, you</p> <p>4 respond verbally when you answer a question as</p> <p>5 opposed to shaking your head or -- or making</p> <p>6 some other body language. Do you understand</p> <p>7 that?</p> <p>8 A. Yes, I understand.</p> <p>9 Q. All right. Are you taking any</p> <p>10 medication today that would affect your</p> <p>11 ability to testify truthfully?</p> <p>12 A. No.</p> <p>13 Q. And is there any other reason why you</p> <p>14 may not be able to testify fully or truthfully</p> <p>15 today?</p> <p>16 A. No.</p> <p>17 Q. Okay. Throughout the deposition, I'm</p> <p>18 going to refer to the University of</p> <p>19 Wisconsin-Madison frequently.</p> <p>20 But just for the ease of our</p> <p>21 conversation, I'll refer to the University of</p> <p>22 Wisconsin-Madison as the university,</p> <p>23 understanding that it refers to the University</p> <p>24 of Wisconsin-Madison. Do you -- do you</p> <p>25 understand that?</p>	<p>12</p> <p>1 change program university wide. So currently,</p> <p>2 my role is titled social media manager.</p> <p>3 Q. And did your job duties change with</p> <p>4 that title change to social media manager?</p> <p>5 A. No.</p> <p>6 Q. How long -- how long have you had</p> <p>7 your -- your current position as -- well, let</p> <p>8 me rephrase the question.</p> <p>9 When did you begin your position as a</p> <p>10 social media specialist?</p> <p>11 A. Yeah. I began in July of 2013.</p> <p>12 Q. And when -- when did the title change</p> <p>13 to social media manager?</p> <p>14 A. I believe it was a few months ago.</p> <p>15 Effectively, it's the same. It's the same</p> <p>16 role, social media specialist and social media</p> <p>17 manager. It was just a title change for title</p> <p>18 and total compensation, university-wide study.</p> <p>19 Q. Through -- in this deposition I'll --</p> <p>20 I'll refer to the title then as social media</p> <p>21 manager.</p> <p>22 But we can -- we can understand, then,</p> <p>23 that it -- it includes your time as a</p> <p>24 specialist as well. Do you -- would you</p> <p>25 understand that?</p>

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4 (13 to 16)

<p>13</p> <p>1 A. Yes, that's fine.</p> <p>2 Q. Okay. Just so we don't have to</p> <p>3 segregate the two titles.</p> <p>4 A. Yeah, I -- I agree.</p> <p>5 Q. Have you held other positions at the</p> <p>6 university?</p> <p>7 A. As a student, yes. But</p> <p>8 professionally, no.</p> <p>9 Q. Can you -- can you work backwards</p> <p>10 then, starting from the most recent position</p> <p>11 you held before becoming a social media</p> <p>12 specialist?</p> <p>13 A. Yeah. So as a student working</p> <p>14 backwards, I was employed by the office of</p> <p>15 visitor and information programs as a social</p> <p>16 media specialist, as well as a campus tour</p> <p>17 guide.</p> <p>18 And I was also employed by the</p> <p>19 Wisconsin union as a creative team intern.</p> <p>20 Q. Can you repeat what department you</p> <p>21 were a social media specialist for as a</p> <p>22 student?</p> <p>23 A. Yes. Visitor information programs.</p> <p>24 Q. What were your job duties at -- as a</p> <p>25 social media specialist for the visitor and</p>	<p>15</p> <p>1 correct?</p> <p>2 A. Correct. July of 2013.</p> <p>3 Q. Okay. In -- so in 2013, what -- what</p> <p>4 social media accounts did you have -- did you</p> <p>5 have access to for the university in your role</p> <p>6 as a social media specialist?</p> <p>7 A. In my professional role I had access</p> <p>8 to university -- flagship university accounts</p> <p>9 that represented the main institutional brand</p> <p>10 and -- and news operations. So @uW-Madison,</p> <p>11 that would be on Facebook, Twitter, Instagram,</p> <p>12 LinkedIn, Pinterest.</p> <p>13 Q. And what was your role at that time,</p> <p>14 in 2013, as a social media specialist with</p> <p>15 access to those accounts?</p> <p>16 A. My role was to -- and continues to be</p> <p>17 the -- the point person or lead communicator</p> <p>18 in charge of all aspects of account</p> <p>19 management. So producing content and</p> <p>20 community management.</p> <p>21 Q. Did you moderate comments</p> <p>22 in -- as -- as early as 2013 as a social media</p> <p>23 specialist?</p> <p>24 A. Yes.</p> <p>25 Q. Okay. And can you -- can you describe</p>
<p>14</p> <p>1 information program?</p> <p>2 A. It was -- yeah, as a social media</p> <p>3 specialist for visitor information programs,</p> <p>4 my primary duties were to manage the social</p> <p>5 media accounts that represented visitor</p> <p>6 information programs and -- and all -- all the</p> <p>7 duties associated with a social media account</p> <p>8 management.</p> <p>9 Q. Okay. And what -- what years were you</p> <p>10 a social media specialist for the visitor and</p> <p>11 information programs?</p> <p>12 A. 2011 through 2013.</p> <p>13 Q. And in what years were you a creative</p> <p>14 team intern for the Wisconsin union?</p> <p>15 A. I believe it was 2012.</p> <p>16 Q. Okay. Did you have any jobs with the</p> <p>17 university, other than the ones that -- that</p> <p>18 you just listed?</p> <p>19 A. Not that I recall.</p> <p>20 Q. Okay. And were you still a student</p> <p>21 when you started as a social media manager for</p> <p>22 the university?</p> <p>23 A. No.</p> <p>24 Q. That started in 2013 that you were a</p> <p>25 social media specialist for the university;</p>	<p>16</p> <p>1 the job duties in your -- in your current</p> <p>2 position?</p> <p>3 A. Yes. As I stated before, I am the</p> <p>4 lead point person for managing all aspects of</p> <p>5 the social media accounts for @UW-Madison.</p> <p>6 I also am a -- I lead the university</p> <p>7 communicators group and serve as a resource</p> <p>8 when needed on all things social media and</p> <p>9 marketing and communications.</p> <p>10 And I -- at the time -- or at --</p> <p>11 from -- from time to time we also have social</p> <p>12 media interns that I supervise. Yeah.</p> <p>13 Q. Okay. Is your -- is your position</p> <p>14 within a specific department at the</p> <p>15 university?</p> <p>16 A. Yes. University communications.</p> <p>17 Q. And is that department nested within</p> <p>18 another department?</p> <p>19 A. Yes. It's within university</p> <p>20 relations.</p> <p>21 Q. And is university relations nested</p> <p>22 within another department?</p> <p>23 A. I don't believe so. The -- the vice</p> <p>24 chancellor for university relations, to my</p> <p>25 understanding, reports directly to the</p>

<p>17</p> <p>1 chancellor.</p> <p>2 Q. Okay. And do any employees report</p> <p>3 directly to you?</p> <p>4 A. Not in their official -- well, sorry.</p> <p>5 "Any employees" could mean student</p> <p>6 employees. At this time, no, we don't have</p> <p>7 any student interns.</p> <p>8 I do work with other full-time staff</p> <p>9 within university communications, but they</p> <p>10 don't report directly to me on an</p> <p>11 organizational chart.</p> <p>12 Q. But -- and you said that -- that</p> <p>13 students do report to you, though; is that</p> <p>14 correct?</p> <p>15 A. When we have student interns they can,</p> <p>16 yes.</p> <p>17 Q. And how many -- how many student</p> <p>18 interns do you generally have at a given time?</p> <p>19 A. It varies from year to year. But I</p> <p>20 have had up to three at --</p> <p>21 Q. [Indiscernible].</p> <p>22 (Indiscernible simultaneous</p> <p>23 colloquy.)</p> <p>24 THE WITNESS: -- time.</p> <p>25 BY MR. BERRY:</p>	<p>19</p> <p>1 A. They read -- read the contents of the</p> <p>2 messages and either, you know, reply as needed</p> <p>3 or mark as done or send to me or another</p> <p>4 communicator on campus.</p> <p>5 Q. Do they -- excuse me.</p> <p>6 Do the student interns have any</p> <p>7 responsibility to help moderate comments on</p> <p>8 social media accounts?</p> <p>9 A. I believe in the past they have. Just</p> <p>10 on an as-needed basis. But it would be with</p> <p>11 my, I guess, indirect supervision. You know,</p> <p>12 I would usually contact them directly if we</p> <p>13 needed assistance. And I would -- you know, I</p> <p>14 would be there to answer questions or assist</p> <p>15 as needed.</p> <p>16 Q. And do they have the ability to</p> <p>17 directly manage -- excuse me.</p> <p>18 Did the student interns have the</p> <p>19 ability to -- to directly moderate themselves,</p> <p>20 then?</p> <p>21 A. With the account level access that</p> <p>22 they were granted, they -- they had the</p> <p>23 ability to.</p> <p>24 Q. And what kinds of -- what types of</p> <p>25 authority did they have to moderate under</p>
<p>18</p> <p>1 Q. And how does it -- how does that vary</p> <p>2 or...</p> <p>3 A. It -- it varies based on, you know,</p> <p>4 need, funding, and availability.</p> <p>5 Q. And other than those student interns,</p> <p>6 you don't -- you don't directly -- no one else</p> <p>7 directs -- reports to you?</p> <p>8 A. No.</p> <p>9 Q. What are the responsibilities of the</p> <p>10 student interns?</p> <p>11 A. Student intern responsibilities are</p> <p>12 primarily content creation where I assign them</p> <p>13 projects to, you know, create campaigns or,</p> <p>14 you know, write -- write social copy or</p> <p>15 special projects as needed throughout the</p> <p>16 year.</p> <p>17 And they also assist in -- inbox</p> <p>18 management for our direct messages.</p> <p>19 Q. Can you repeat that. What type of</p> <p>20 management did they assist in?</p> <p>21 A. Direct message. So managing -- or</p> <p>22 helping to manage our -- our direct message</p> <p>23 inboxes.</p> <p>24 Q. How do they -- how do they help manage</p> <p>25 the -- the direct message inboxes?</p>	<p>20</p> <p>1 that -- those -- that account access?</p> <p>2 A. They had -- sorry. Can you clarify</p> <p>3 "authority"?</p> <p>4 Q. Yeah, and based on their abilities</p> <p>5 handling the social media accounts, what sort</p> <p>6 of moderation powers did they have access to?</p> <p>7 A. Based on their access level on either</p> <p>8 Facebook or Instagram, they have the ability</p> <p>9 to reply or hide or delete comments or -- or</p> <p>10 any other options granted to them by Facebook</p> <p>11 or Instagram.</p> <p>12 Q. And what would those options have been</p> <p>13 that the interns had the ability to do under</p> <p>14 Instagram or Facebook?</p> <p>15 A. Other options -- so Facebook sets --</p> <p>16 or -- and Instagram, but primarily Facebook.</p> <p>17 But they set levels of -- of access, I guess.</p> <p>18 And so as far as I recall, the</p> <p>19 abilities I previously mentioned were those</p> <p>20 available to them and -- but others that we</p> <p>21 probably didn't use very often included the</p> <p>22 ability to report a comment. And that -- that</p> <p>23 ability is available to anybody, whether</p> <p>24 you're an account administrator or member of</p> <p>25 the public or a follower of the account, so</p>

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6 (21 to 24)

<p>21</p> <p>1 long as you have a Facebook or Instagram 2 account. 3 Q. Did the -- did the interns have the 4 ability to -- to block users? 5 A. I'm not sure if they had that ability 6 at their account level access. I don't 7 recall. 8 Q. But they did have the ability to reply 9 to -- excuse me. Let me rephrase the 10 question. 11 The student interns previously had the 12 ability to reply to comments, hide comments, 13 delete comments, and report comments relating 14 to the university's social media accounts. 15 And beyond that, you're not sure if 16 they had access to any other moderation 17 privileges? 18 MR. KILPATRICK: I'm going to object 19 as a compound question. 20 BY MR. BERRY: 21 Q. You can answer the question. 22 A. I'm sorry. Could you repeat that? 23 Q. So the -- the student interns had the 24 ability to -- to reply to comments, hide 25 comments, delete comments, and report comments</p>	<p>23</p> <p>1 Q. In your current position, do you have 2 a primary responsibility for overseeing 3 operations of the university's social media 4 accounts on Facebook and Instagram? 5 A. Yes, I do. 6 Q. And how long have you been the primary 7 person responsible for social media 8 moderation? 9 A. Since my job began in July, 2013. 10 Q. What actions under moderation are you 11 responsible for? 12 A. What do you mean by "responsible for"? 13 Q. What types -- what types of moderation 14 do you -- can you perform as the primary 15 person responsible for moderation? 16 A. Well, they vary by social media 17 platform. Could you be more specific? 18 Q. Yeah. Let's see. Sure. Can you just 19 describe the ways that someone can manually 20 moderate a user's comments on the university's 21 Instagram account. 22 A. The way that an account administrator 23 can moderate a user's comment on Instagram 24 include replying to the comment, deleting a 25 comment, reporting a comment. I believe those</p>
<p>22</p> <p>1 relating to the university's social media 2 accounts; is that correct? 3 A. As far as I can recall, yes. 4 Q. And as far as you can recall, you're 5 not sure if they had the ability to perform 6 any other sort of moderation beyond the -- the 7 replying to comments, deleting comments, and 8 reporting comments? 9 A. As far as I can recall, yes. 10 Q. Who -- how many student interns do you 11 currently have, if any? 12 A. Zero. 13 Q. Okay. When was the last time you had 14 student interns? 15 A. May 2020. 16 Q. Who -- so going beyond who reports to 17 you, my next question is, who do you report to 18 at the university? 19 A. I report to Mike Klein. 20 Q. And what's Mike -- Mike Klein's title? 21 A. His title also recently changed. So I 22 don't recall his specific title as it is now 23 as opposed to a few months ago. But he is an 24 editor, and I believe director of news 25 content.</p>	<p>24</p> <p>1 are the three options on a comment level 2 that -- that administrators have access to. 3 Q. Are you able to moderate comments by 4 hiding them from public view instead of 5 deleting them entirely? 6 A. So there is an option that is at an 7 account level to restrict an account. And if 8 a user is restricted on an account level, then 9 an account administrator has the ability to 10 either approve the comment, delete the comment 11 or leave it be. 12 Q. Is there -- is there any way to 13 hide -- hide a comment from public view where 14 the person making the comment would see their 15 comment, but other people would not see 16 Instagram? 17 A. Sorry. Could you repeat the question? 18 Q. Yeah. On Instagram, are there any 19 circumstances where you can moderate comments 20 so that they still appear to the person who 21 made the comment, but other people cannot see 22 the comment? 23 A. I believe that is a circumstance where 24 the user has that account level restriction so 25 the user who -- who wrote the comment can see</p>

<p>25</p> <p>1 it, but others cannot.</p> <p>2 Q. Okay. So when an Instagram user</p> <p>3 account is restricted by another Instagram</p> <p>4 account, all the comments that the restricted</p> <p>5 user makes on that account are hidden from</p> <p>6 everyone, except for the restricted user; is</p> <p>7 that correct?</p> <p>8 A. Yes.</p> <p>9 Q. And so other Instagram users cannot</p> <p>10 see or reply to those comments?</p> <p>11 A. As far as I'm familiar with the</p> <p>12 Instagram tool and settings, yes.</p> <p>13 Q. And if a -- if a restricted user</p> <p>14 replies to other comments on the restricting</p> <p>15 Instagram account posts, other Instagram users</p> <p>16 will not be able to see or respond to those</p> <p>17 replies; is that correct?</p> <p>18 A. I don't know. I'm sorry.</p> <p>19 Q. Do you -- okay.</p> <p>20 If a -- now, earlier</p> <p>21 you -- you mentioned that you can place an</p> <p>22 account level restriction. Do you remember</p> <p>23 that?</p> <p>24 A. Yes, I do.</p> <p>25 Q. If a restriction on an account is</p>	<p>27</p> <p>1 So on Facebook an admin has the</p> <p>2 ability to reply to a comment, delete a</p> <p>3 comment, report a comment. And unlike</p> <p>4 Instagram, on Facebook an admin has the</p> <p>5 ability to hide a comment on a</p> <p>6 comment-by-comment basis.</p> <p>7 Q. On -- on Facebook can a -- can friends</p> <p>8 see a restricted user's comments on Facebook</p> <p>9 even if it -- even if other people cannot?</p> <p>10 A. Unlike Instagram, Facebook does not</p> <p>11 have restricted users. There is no account</p> <p>12 level restriction on Facebook like there is on</p> <p>13 Instagram where I previously described the</p> <p>14 Instagram settings.</p> <p>15 Q. Are you aware of any behavior, either</p> <p>16 on Instagram or Facebook, where -- where a</p> <p>17 comment can be moderated so that -- so that</p> <p>18 friends of the commentor can -- can see the</p> <p>19 comment, but nobody else can?</p> <p>20 A. Yes, I am.</p> <p>21 Q. Is that special to Facebook, but</p> <p>22 Instagram -- sorry. If I could rephrase the</p> <p>23 question.</p> <p>24 Can you -- can you describe what</p> <p>25 platforms have that mechanism?</p>
<p>26</p> <p>1 removed, what happens to previous comments</p> <p>2 made by the restricted account?</p> <p>3 A. I believe they that are unrestricted</p> <p>4 or -- or unhidden at that point.</p> <p>5 Q. Okay. You said you believe that</p> <p>6 they're unhidden. Does that -- does that mean</p> <p>7 that you're not entirely sure what happened if</p> <p>8 a restriction on that account was removed?</p> <p>9 A. Yes. I'm unsure. I don't recall at</p> <p>10 this specific point. There are a lot of</p> <p>11 settings and -- yeah. And Instagram and</p> <p>12 Facebook change their settings from time to</p> <p>13 time without account, you know, admins</p> <p>14 knowing.</p> <p>15 So to the best that I can recall</p> <p>16 or -- yeah, I'm not sure.</p> <p>17 Q. Okay. Now, I want to walk through</p> <p>18 this sort of similar line of questions with</p> <p>19 regards to Facebook.</p> <p>20 Can you -- can you describe how</p> <p>21 Facebook moderation differs from Instagram</p> <p>22 moderation?</p> <p>23 A. Yes. Facebook offers different</p> <p>24 moderation tools, and some similar or</p> <p>25 identical ones.</p>	<p>28</p> <p>1 A. Facebook has that mechanism where</p> <p>2 if -- if a user's comment is hidden, it can</p> <p>3 still be visible to the commentor and Facebook</p> <p>4 friends of the commentor.</p> <p>5 Q. Is there any way for somebody without</p> <p>6 a Facebook account to view university's social</p> <p>7 media posts on Facebook?</p> <p>8 A. I believe so, yes. I've tried that</p> <p>9 before when, like, not log into Facebook. You</p> <p>10 can still view the account and posts. But</p> <p>11 very quickly, Facebook will prompt you to sign</p> <p>12 in and act as an -- as, you know, a -- an</p> <p>13 account capacity.</p> <p>14 Q. Is there any way for individuals</p> <p>15 without Instagram accounts to view posts and</p> <p>16 comments from the university's social media</p> <p>17 account?</p> <p>18 A. Yes. I believe in a similar fashion</p> <p>19 to Facebook.</p> <p>20 Q. There's also automatic moderation on</p> <p>21 Instagram and Facebook; is that correct?</p> <p>22 A. Yes.</p> <p>23 Q. Can you describe how automatic</p> <p>24 moderation works?</p> <p>25 A. Sure. So automatic moderation is a</p>

<p>29</p> <p>1 tool offered through Facebook and Instagram</p> <p>2 where -- sorry.</p> <p>3 Where an account administrator can add</p> <p>4 a word or phrase to a list within Facebook or</p> <p>5 Instagram where if a commentor uses that word</p> <p>6 or phrase in their comment, the comment will</p> <p>7 automatically be hidden.</p> <p>8 Q. And when a comment's been</p> <p>9 automatically moderated and hidden on Facebook</p> <p>10 or Instagram, that means no one can view it;</p> <p>11 correct?</p> <p>12 A. I believe the commentor can still see</p> <p>13 their comment.</p> <p>14 Q. Okay. Now, could people reply or</p> <p>15 otherwise interact with hidden comments that</p> <p>16 they can't view?</p> <p>17 A. If on Facebook the hidden</p> <p>18 comment -- let me rephrase that.</p> <p>19 If -- if -- if an individual comments</p> <p>20 on Facebook and includes a word or a phrase</p> <p>21 within the list -- the auto-moderated list set</p> <p>22 by the account administrator, that comment is</p> <p>23 hidden.</p> <p>24 However, I believe that both the</p> <p>25 commentor and friends of the commentor can</p>	<p>31</p> <p>1 You can share Facebook posts to your</p> <p>2 account and have your -- your own comment</p> <p>3 section, or users interact in various ways</p> <p>4 by -- by -- with your -- a user's post based</p> <p>5 on sharing that original post by the</p> <p>6 university.</p> <p>7 On Instagram, you can -- and when I</p> <p>8 say "you," I mean a user.</p> <p>9 On Instagram you can hit the share</p> <p>10 button and you can share it. You can share</p> <p>11 that post to your story.</p> <p>12 And a story is typically a</p> <p>13 24-hour -- it's -- it's a temporary post</p> <p>14 that -- that's live for 24 hours to either the</p> <p>15 public or, you know, a set of friends that the</p> <p>16 user determines.</p> <p>17 You can -- as a user, you can report a</p> <p>18 Facebook or Instagram post. You can embed</p> <p>19 Facebook and Instagram posts, say, you know,</p> <p>20 off -- on a different website.</p> <p>21 There might be more, but I'm -- I -- I</p> <p>22 don't recall any others at this time.</p> <p>23 Q. Okay. How would -- how would somebody</p> <p>24 see -- excuse me.</p> <p>25 How would a university social media</p>
<p>30</p> <p>1 still see that comment made by the original</p> <p>2 commentor.</p> <p>3 Q. And -- and on Instagram, even -- can</p> <p>4 friends see that on -- excuse me. Let me</p> <p>5 rephrase the question.</p> <p>6 Can friends see restrictive comments</p> <p>7 on Instagram?</p> <p>8 A. I don't believe so. That's where</p> <p>9 Facebook and Instagram differ with their</p> <p>10 platform settings.</p> <p>11 Q. And are there other ways that an</p> <p>12 Instagram or Facebook user can interact with a</p> <p>13 university social media account other than by</p> <p>14 commenting on a post?</p> <p>15 A. Yes. Many.</p> <p>16 Q. What are -- can you list off the</p> <p>17 different ways, other than commenting on a</p> <p>18 post, that a -- Instagram or Facebook users</p> <p>19 can interact with the university's social</p> <p>20 media account?</p> <p>21 A. Yeah. A user can like or react. So a</p> <p>22 user can like an Instagram post or a user can</p> <p>23 react. Because Facebook has different</p> <p>24 reactions, you can like or love or use</p> <p>25 different kind of emoticons set by Facebook.</p>	<p>32</p> <p>1 post present itself to other people?</p> <p>2 Actually, let me rephrase that question one</p> <p>3 more time.</p> <p>4 When the university makes a new social</p> <p>5 media post, how -- how does that post get out</p> <p>6 to other people?</p> <p>7 A. Primarily, a Facebook or Instagram</p> <p>8 post is delivered onto a user's news feed</p> <p>9 based on if they -- if that user is following</p> <p>10 the Facebook or Instagram account.</p> <p>11 However, there's a thing called --</p> <p>12 like the Facebook and Instagram algorithm</p> <p>13 where Facebook and Instagram ultimately</p> <p>14 determine where and who they deliver</p> <p>15 those -- those posts to.</p> <p>16 They'll sometimes suggest a post by a</p> <p>17 page to a user, even if they're not following.</p> <p>18 And on the flip side, they -- Facebook or</p> <p>19 Instagram might not display a post by an</p> <p>20 account you're following in your news feed.</p> <p>21 And that's just based on Facebook and</p> <p>22 Instagram's algorithms.</p> <p>23 Q. Does the -- does the university</p> <p>24 ever -- ever pay to have their -- the social</p> <p>25 media accounts suggested or advertised to</p>

<p>33</p> <p>1 people?</p> <p>2 A. In a limited capacity, yes. It's</p> <p>3 that -- but those are not managed by me or</p> <p>4 anyone in university communications.</p> <p>5 Q. Can you -- can you describe the</p> <p>6 limited circumstances where the accounts are</p> <p>7 advertised?</p> <p>8 A. Yeah. Those advertisements are</p> <p>9 managed by university marketing, which is a</p> <p>10 sibling office to university communications.</p> <p>11 But specialists within university marketing</p> <p>12 will run advertisements based on a certain</p> <p>13 campaign.</p> <p>14 We -- the university has had several</p> <p>15 campaigns in the past. The most recent one</p> <p>16 being COVID-19 safety and public health</p> <p>17 awareness.</p> <p>18 But in a limited capacity, we don't</p> <p>19 pay to boost organic posts. It -- but -- but</p> <p>20 the university does advertise on -- on</p> <p>21 Facebook and Instagram based on a certain</p> <p>22 campaign running that is determined by</p> <p>23 university marketing.</p> <p>24 Q. Other than COVID, what other campaigns</p> <p>25 have been run in the past that you're aware</p>	<p>35</p> <p>1 And I believe that campaign -- we ran</p> <p>2 that campaign January through June of 2021 to</p> <p>3 the best that I can recall.</p> <p>4 Q. And what kind of social media</p> <p>5 advertising did they do in that campaign that</p> <p>6 you remember?</p> <p>7 STENOGRAPHER: I'm sorry.</p> <p>8 (Captured testimony read</p> <p>9 back.)</p> <p>10 BY MR. BERRY:</p> <p>11 Q. Sorry. That you remember.</p> <p>12 A. I don't recall -- or I can't recall</p> <p>13 any specific ads that were run.</p> <p>14 Q. Okay. With regards to the COVID</p> <p>15 campaign, did the advertisements include any</p> <p>16 @UW-Madison posts?</p> <p>17 A. Could you clarify that, please?</p> <p>18 Q. With -- with regards to the COVID</p> <p>19 campaign where -- were any @UW-Madison social</p> <p>20 media posts advertised or promoted in</p> <p>21 connection with that campaign?</p> <p>22 A. If I understand your question</p> <p>23 correctly --</p> <p>24 (Telephone ringing.)</p> <p>25 THE WITNESS: I'm sorry. I'm getting</p>
<p>34</p> <p>1 of?</p> <p>2 A. We had a campaign called can't stop a</p> <p>3 Badger. We've also had a campaign called</p> <p>4 IMUW. And we also allow division of</p> <p>5 continuing studies to advertise for summer</p> <p>6 term and other division of continuing studies</p> <p>7 campaigns.</p> <p>8 Q. With regards to the can't stop a</p> <p>9 Badger campaign, what time period did that</p> <p>10 campaign run?</p> <p>11 A. I don't know. I'm sorry. I really</p> <p>12 only deal with the organic side. Organic</p> <p>13 meaning not adver- -- not paid advertisement.</p> <p>14 It -- it happens on a different side of</p> <p>15 Facebook or Instagram that I -- I don't</p> <p>16 monitor regularly.</p> <p>17 Q. So can you even give, just your best</p> <p>18 guess, with the caveat that you don't know</p> <p>19 this, that the dates that it ran very -- very</p> <p>20 well?</p> <p>21 A. Sure. Well, we had an</p> <p>22 organic -- well, the campaign exists outside</p> <p>23 of social media advertisements. If, in fact,</p> <p>24 they do run social advertisements for can't</p> <p>25 stop a Badger.</p>	<p>36</p> <p>1 an incoming call on my office phone, but I</p> <p>2 won't answer it.</p> <p>3 Okay. There we go. Sorry. Sorry for</p> <p>4 the interruption.</p> <p>5 So if I understand your question</p> <p>6 correctly, a -- a social media has to have an</p> <p>7 account where the ad originates from.</p> <p>8 So, yes, there are advertisements</p> <p>9 coming from @UW-Madison Facebook and Instagram</p> <p>10 from -- from those accounts.</p> <p>11 BY MR. BERRY:</p> <p>12 Q. With -- going back to the can't stop a</p> <p>13 Badger campaign, what was -- what was that</p> <p>14 campaign about, to the best of your knowledge?</p> <p>15 A. Yeah. That campaign kind</p> <p>16 of -- they -- it featured kind of various</p> <p>17 aspects of the university center, and it was</p> <p>18 kind of like a statewide outreach campaign.</p> <p>19 So targeted at in-state residents.</p> <p>20 And I believe that was for the</p> <p>21 legislative cycle at that time to, you know,</p> <p>22 raise awareness and promote various aspects of</p> <p>23 the university that were deemed important by</p> <p>24 folks in university marketing and elsewhere.</p> <p>25 Q. And you say for -- this was during the</p>

<p>37</p> <p>1 legislative cycle that this campaign ran for 2 can't stop a Badger? 3 A. That I'm aware of, yes. 4 Q. Yeah. And that would be for 5 presumably just for university funding and 6 reputation? 7 Would that be a fair characterization? 8 Or sorry, let me rephrase the question. 9 Why would -- why would the legislative 10 cycle be relevant to the campaign as far as 11 you know? 12 A. Yeah. I think for, you know, public 13 perception and ultimately, funding or for, you 14 know, the passage of certain bills or pieces 15 of legislator that were up for debate. 16 Q. And moving to the IamUW campaign, 17 what -- what was that campaign about? 18 A. That campaign was apparently 19 about -- it's -- it's a diversity equity and 20 inclusion initiative geared towards current 21 students to build community around personal 22 identities, you know, ethnicity, race, 23 culture, and -- and other forms of identity to 24 build community within the current student 25 body.</p>	<p>39</p> <p>1 option to like -- well, tag -- tag a user 2 within the image itself so that if you tap the 3 image, you can see tags pop up of one or, I 4 think up to 25 accounts. 5 And you can also tag university in an 6 Instagram story, either with a sticker -- the 7 at mention sticker or by, you know, plain 8 text, writing out at -- at UW-Madison or any 9 account within text that you insert into your 10 Instagram story. 11 Q. If somebody tags the university, does 12 that -- does that -- will -- will the post 13 where they've tagged the university appear 14 anywhere on the university's social media 15 account or feed? 16 A. I'm sorry. Sorry. Could you repeat 17 the question? 18 Q. Sure. Let me put it this way: 19 What -- what does the university see when 20 somebody tags it on a Facebook or Instagram 21 post? 22 A. I -- sorry. I interpreted your 23 clarification question differently than your 24 original question. 25 Q. That's okay. I think the</p>
<p>38</p> <p>1 Q. And what, to the best of your 2 knowledge, what dates did that campaign run? 3 A. We were still having in-person 4 meetings, so it was prior to the pandemic, 5 maybe as far back as 2018 or 2019 up to, I 6 would say maybe May 2020. But 7 that's -- that's my best guess. 8 Q. Can you describe the ability to tag 9 the university on Instagram and Facebook? 10 A. Sure. Could you clarify "tag" 11 as -- as the university itself, as a user? 12 What do you mean by that? 13 Q. Yeah. Are -- are users able to tag 14 the university's social media account in their 15 own Facebook and Instagram posts? 16 A. Yes. They work a little differently 17 on -- on each platform. But, you know, if I 18 were a user and, you know, I'm -- I'm posting 19 a photo of my mug of coffee, it has Bucky 20 Badger on it, say, I could write a caption and 21 at mention tag the university or the 22 @UW-Madison. And -- and same with Facebook, 23 you can, you know, at mention and tag 24 UW-Madison in your post. 25 And on Instagram, there's also the</p>	<p>40</p> <p>1 clarification question is a more clear one. 2 So, yeah, just -- yeah, what does the -- we 3 can scrap all that. 4 Just what does the university see when 5 someone tags it in a Facebook or Instagram 6 post? 7 A. Well, I wouldn't say "see," because 8 that's dependent on the admin's -- you know, 9 if -- if they see. 10 But Facebook and Instagram will 11 deliver notifications to the admin level -- or 12 to -- to account administrators that a user 13 tagged the university in a post or video. 14 Or if that -- what I mentioned earlier 15 about a user tagging within the Instagram 16 photo or video itself, there is a separate tab 17 on the university's Instagram account where 18 you can view tagged photos and videos where 19 that -- that user's content -- not the 20 university's content, but the user's content 21 is visible so far as the user who performed 22 the tag has a public account. 23 Q. And is there -- does Facebook have a 24 similar way to view tagged posts from the 25 university's page?</p>

<p>41</p> <p>1 A. Facebook functions vary differently in 2 that regard. It's much larger than 3 Instagram's platform or functionality within a 4 page. 5 I don't believe that -- and there 6 are -- you know, different privacy barriers 7 within Facebook. So I don't believe that 8 other users can see tagged -- can see posts by 9 other users that have tagged the university. 10 Q. Okay. So just talking about 11 Instagram, then, are there ways to moderate a 12 tag when the university has been tagged in 13 somebody else's post? 14 A. Yes. The university can report the 15 post by the user. The university can untag 16 itself in -- in the user's post. The 17 university can just hide that -- that user's 18 post from appearing on the tagged tab on the 19 university's account. 20 Q. Okay. With regards to my client 21 Ms. Krasno, you -- you've moderated comments 22 made by Ms. Krasno on the university's 23 Facebook page; is that correct? 24 A. That's correct. 25 Q. And have you restricted her account on</p>	<p>43</p> <p>1 media accounts; is that -- is that correct? 2 A. Yes. 3 Q. So from the time period before the 4 lawsuit was filed, can you describe how 5 decisions for moderating comments were made 6 within your department? 7 A. Sure. You know, it's a -- really a 8 case-by-case basis. You know, it can't -- but 9 in general, we have a social media statement 10 on our website that kind of, I would say, 11 provides a guide for how we manage comment 12 moderation as social media managers. 13 Q. And when -- how long has this social 14 media guide as you call it, how long has that 15 social media guide been on the university's 16 Web page? 17 MR. KILPATRICK: Objection. The 18 witness called it a social media statement. 19 MR. BERRY: Statement, okay. Yeah. 20 BY MR. BERRY: 21 Q. How long has that social media 22 statement been on the website? 23 A. For as long as I can remember. 24 It -- it was -- it had been established on the 25 website when I started in July of 2013.</p>
<p>42</p> <p>1 the university Instagram page? 2 A. That's correct for a -- a specific 3 period of time. 4 Q. And have you moderated comments by her 5 on the university's Instagram account? 6 A. Yes. 7 Q. And were those moderations of 8 Ms. Krasno done within the scope of your 9 duties as a social media manager for the 10 university? 11 A. Yes. 12 Q. And did you perform those actions 13 using a work computer? 14 A. Yes, I did. 15 Q. And when you performed those 16 moderation activities with regards to 17 Ms. Krasno, were you being paid by the 18 university for your job as a social media 19 specialist? 20 A. Yes, I was. 21 Q. Okay. So earlier you said that is a 22 part of your position, that you -- you're the 23 primary person responsible for moderating and 24 at times you supervise and guide others at the 25 university about moderating on the social</p>	<p>44</p> <p>1 Q. Is it -- has the social media 2 statement changed during your course of 3 employment as a social media manager? 4 A. Not that I know of, no. 5 Q. Okay. And let's see. 6 Other than the social media statement, 7 were -- were there -- were there any -- any 8 other guidance from the university that 9 affected your moderating management? 10 A. Yeah. The office of legal affairs 11 provided some interim guidance in the spring 12 of 2021. 13 Q. And interim guidance in the spring 14 of 2021, was that before or after this lawsuit 15 was filed? 16 A. I believe it was after. 17 Q. Okay. So this -- other than the 18 social media statement on the website before 19 the lawsuit was filed, can you describe how 20 decisions for moderating comments were made? 21 Let me rephrase that question, actually. 22 Can you describe how the social media 23 statement related to your decisions for 24 moderating comments on social media? 25 A. Yeah. I would call the social media</p>

Transcript of Nate Moll
Conducted on March 9, 2022

12 (45 to 48)

<p>45</p> <p>1 statement as, you know, our reference guide 2 for what types of comments to moderate, if 3 needed. 4 Q. And what types of comments does 5 it -- what types of comments do you moderate 6 based on that social media statement? 7 A. Yeah. The statement lists, you know, 8 several criteria. If a comment is profane, 9 obscene, off topic, a commercial or just 10 outside promotion not affiliated with the 11 university, injurious or illegal. There might 12 be other criteria, but I can't recall at this 13 time. 14 Q. Okay. Actually, I want to mark as 15 Exhibit 20 the UW0150. 16 MR. BERRY: Can we get that marked and 17 shared up on the screen? This is the social 18 media statement Web page. 19 (Whereupon, Moll Deposition 20 Exhibit No. 20 was marked 21 for identification.) 22 MR. BERRY: All right. Thanks. 23 BY MR. BERRY: 24 Q. Do you -- do you see the -- what's 25 marked as Exhibit 20, Mr. Moll?</p>	<p>47</p> <p>1 Q. What's the -- in what ways do 2 the -- do the social media guidelines differ 3 from the social media statement, if at all? 4 A. So the -- they -- they list -- the 5 social media guidelines on the university 6 relations website go into much greater depth 7 about social media management as an employee 8 of the university, as well as representing 9 yourself in your personal capacity. 10 And they're more about account 11 management and -- and, you know, functioning 12 as university employees within the social 13 media space. 14 Q. Okay. So the -- so the social media 15 guidelines are -- are about posting in the 16 circumstances where -- where you represent or 17 might be considered to represent the 18 university; is that -- is that a fair 19 characterization? 20 A. Generally, yes. 21 Q. And then is there any guidance on the 22 social media guidelines on the relations page 23 with regards to moderation of social media 24 comments? 25 A. I believe it's briefly mentioned.</p>
<p>46</p> <p>1 A. Yes, I do. 2 Q. Are you familiar with this document? 3 A. I am. 4 Q. And what is it? 5 A. This is a social media statement. 6 Q. And I understand this document is the 7 university's currently operative social media 8 statement. Would you agree with that 9 characterization? 10 A. Yes. 11 Q. And earlier you said this -- to the 12 best of your knowledge, it's the -- this is 13 the language that's been in effect since you 14 started in 2013; is that right? 15 A. To the best of my knowledge, yes. 16 Q. This -- are you aware of any other 17 publicly available guidance about social media 18 moderation for the university, other than this 19 statement? 20 A. There is also a set of social media 21 guidelines posted on the university relations 22 website that's available to the public. 23 Q. And what department did you say the 24 social media guidelines were on? 25 A. University relations.</p>	<p>48</p> <p>1 Q. Do you remember what it says about 2 moderation or those guidelines? 3 A. I don't recall what it says, no. 4 Q. Okay. Going back to Exhibit 20, the 5 social media statement that's in front of us, 6 what -- can you -- can you explain your 7 understanding what this policy says about 8 off-topic comments? 9 A. Sure. Well, I do want to clarify, 10 this isn't a policy. It's a social media 11 statement. 12 Q. Is there -- is there any policy, to 13 your knowledge, that you've been aware of 14 that's impacted your moderating decisions as 15 the social media manager? 16 A. No. We haven't had a policy, and 17 currently do not. 18 Q. So that's -- so let me rephrase my 19 question, then. 20 Does this statement, marked as 21 Exhibit 20 here, what does this statement say 22 with regards to moderating or posting 23 off-topic comments to the university social 24 media sites? 25 A. Yeah. The statement lists off topic</p>

<p>49</p> <p>1 as one of the criteria where the university 2 shall have the right to remove 3 any -- that -- the content that includes the 4 criteria being off topic, but not limited to 5 being off topic. 6 Q. Is there a -- what's your 7 understanding of when a comment is off topic 8 under this social media statement? 9 A. Under this social media statement I 10 would determine a comment to be off topic that 11 generally doesn't cover the topic of a 12 specific social media post made by the 13 university. 14 Q. And is there any definition for how to 15 determine when something is off topic, either 16 on a statement or anywhere else within the 17 university? 18 A. Office of legal -- excuse me. 19 Office of legal affairs did produce 20 some interim guidance, particularly as it 21 relates to the criteria of being off topic and 22 provided further clarification within that 23 interim guidance. 24 MR. BERRY: All right. Can we 25 actually introduce as Exhibit 21 the -- what</p>	<p>51</p> <p>1 (Captured testimony read 2 back.) 3 THE WITNESS: Oh, produced by office 4 of legal affairs. 5 STENOGRAPHER: Thank you. 6 BY MR. BERRY: 7 Q. Does this guidance change how you 8 moderated comments? 9 A. In regards to the criteria listed in 10 the social media statement, and the criteria 11 being off topic, yeah, this provided further 12 guidance, how to determine whether a specific 13 comment was -- or content is on or off topic. 14 Q. Okay. Did it -- did it change your 15 own view of what an off-topic comment was? 16 A. Yeah. It -- it provided -- it 17 educated me more on -- on how to determine 18 whether a comment fit the criteria of being 19 off topic or not. 20 Q. Okay. And how -- how -- how did 21 it -- how did it change your view or inform 22 your view further on what an off-topic post 23 is? 24 A. I -- I think it helped -- it helped me 25 understand, you know, the -- like the middle</p>
<p>50</p> <p>1 would be marked as the UW0076 file? 2 And this is an email entitled "Interim 3 Social Media Moderation Guidance." 4 (Whereupon, Moll Deposition 5 Exhibit No. 21 was marked 6 for identification.) 7 BY MR. BERRY: 8 Q. All right. Mr. Moll, do you see -- do 9 you see as Exhibit 21 in front of you? 10 A. I see an email. I don't see it 11 labeled as Exhibit 21. 12 Oh, there it is. Yes. 13 Q. And are you familiar with this 14 document? 15 A. Could you scroll up to the top again, 16 please? 17 Yes. I am familiar with this 18 document. 19 Q. And what is it? 20 A. This is the interim social media 21 guidance -- [indiscernible] -- legal affairs. 22 STENOGRAPHER: I'm sorry. 23 THE WITNESS: I'm sorry. 24 STENOGRAPHER: I didn't catch what you 25 said.</p>	<p>52</p> <p>1 ground. You know, sometimes it -- it's a 2 human decision, you know, in all these cases. 3 I should -- well, so the -- under the 4 section content moderation, on topic versus 5 off topic, the -- that guidance helps clarify 6 situations where a comment may be on topic, 7 even if it also includes off-topic content or 8 vice versa. 9 Q. Okay. At the very first sentence of 10 Exhibit 21 here, this interim social media 11 guidance, says that [as read]: 12 "The social media managers 13 may engage in content 14 moderation on social media 15 pages based on one 16 criteria whether posted 17 content is on or off 18 topic." 19 Do you understand that as requiring 20 you to -- to remove anything that's off topic 21 or just that, that you're able to, if you 22 want? 23 A. It says "may engage." So it's -- it 24 doesn't require any social media manager to do 25 so.</p>

<p>53</p> <p>1 Q. Yeah. How do you -- how do you 2 determine whether to -- whether to remove 3 something that's off topic or not? 4 A. Sorry. Could you clarify what you 5 mean by "remove"? 6 Q. Sorry. Yeah. As we -- well, as we 7 stated earlier, there are a number of ways to 8 moderate a comment. Do you remember that 9 conversation? 10 A. Yes. 11 Q. So my question is: How do you decide 12 whether to exercise any of your moderation 13 powers with regard to an off-topic comment? 14 A. Social -- or comment -- as a social 15 media manager, one of the -- you know, duties 16 of my role is -- is to review comments that 17 are made on UW-Madison social media posts. 18 And so as per that job -- you know, 19 part of my job I would consider comment 20 moderation determining, you know, if -- if 21 comments meet the criteria listed in the 22 social media statement. 23 Q. Do you always remove off-topic 24 comments? 25 A. Not always, but to the best of my</p>	<p>55</p> <p>1 it can be hidden or deleted, replied to or 2 reported. 3 Q. How do you decide whether to hide, 4 remove, report or reply to an off-topic 5 comment? 6 A. It -- it depends on the social media 7 platform. There are different functions 8 within Facebook and Instagram as we described 9 earlier. 10 Q. How do you -- how do you -- among the 11 different options, do you -- do you 12 consistently use one over the others when 13 you're deciding how to moderate an off-topic 14 comment? 15 A. I -- I -- to the best of my ability, 16 yes. But as -- as social media platforms 17 evolve, you know, Facebook and Instagram 18 introduce different tools available to account 19 managers. 20 And -- and so as social media 21 platforms evolve, so must the social media 22 manager or we have -- I have the ability to, 23 based on the tools provided. 24 Q. Right. How do you choose what tool to 25 use?</p>
<p>54</p> <p>1 abilities, I try to, you know, abide and 2 remain consistent with those criteria listed 3 in the social media statement. 4 But social media posts are living 5 documents. And so users can comment or remove 6 their comments or perform any action available 7 to a user at any time. And so I might not 8 always see every comment. 9 Q. Okay. Then you're saying -- well, 10 you're testifying that you try to 11 remove -- and let me know if I'm 12 characterizing this correctly -- that you try 13 to remove all off-topic -- off-topic comments 14 to the best of your ability? 15 A. With the understanding that "remove" 16 means any -- any form of moderation as we've 17 described earlier, yes. 18 Q. So it's -- so to put that more 19 clearly, it's your testimony that you try to 20 moderate off-topic comments to the best of 21 your ability all the time? 22 A. To the best of my ability, yes. 23 Q. All right. And in what ways do you 24 moderate off-topic comments? 25 A. If an off-topic comment is moderated,</p>	<p>56</p> <p>How do you choose what the optimal 2 tool is for any given off-topic comment? 3 A. It really depends on the situation, 4 whether it's -- you know, if we're talking 5 about a -- an individual off-topic comment, 6 then on -- Facebook, you know, could hide it. 7 But on Instagram, which doesn't have a 8 hide feature for individual comments, if it's 9 deemed to be off topic, then we'd likely 10 delete it. 11 MR. BERRY: We -- let's -- I know we 12 have been doing this for like an hour and a 13 half. Should we just take like a ten-minute 14 break? And then we can split up the morning 15 in half that way before lunch. 16 MR. KILPATRICK: That sounds good to 17 me. 18 MR. BERRY: Okay. 19 VIDEOGRAPHER: I'll bring us off the 20 record. 21 The time is 11:33. We're going off 22 the record at the end of recording 1. 23 (A short recess was had.) 24 VIDEOGRAPHER: The time is 11:45. 25 We're on the record at the start of recording</p>

<p>57</p> <p>1 2. 2 MR. BERRY: All right. Welcome back. 3 Could we get Exhibit 21 back on -- on 4 the screen? 5 BY MR. BERRY: 6 Q. Okay. Mr. Moll, earlier we were -- 7 previously we were talking about wh- -- 8 deciding when to remove off-topic comments. 9 And looking back on -- to Exhibit 21 10 here where it says [as read]: 11 "Social media managers may 12 engage in content 13 moderation for off-topic 14 comments." 15 What -- what -- why did you decide to 16 try to remove all off-topic comments to the 17 best of your ability, even though this interim 18 guidance authorizes you to moderate comments, 19 but not require you to do so. 20 I could -- you know, actually, let me 21 just rephrase that. 22 Would -- would you agree that this -- 23 that this interim social media moderation 24 guidance authorizes you, but doesn't require 25 you to moderate off-topic comments?</p>	<p>59</p> <p>1 And so, you know, as -- as I've, you 2 know, grown, and as I've grown in, in this job 3 position, I have taken on more responsibility 4 and also delegated when -- when needed or -- 5 or when applicable. 6 Q. So you're saying that -- that you've 7 always tried to consistently remove all 8 off-topic comments to the best of your 9 ability? 10 Is that a fair characterization of 11 what you're testifying? 12 A. To the best of my ability, yes. 13 MR. BERRY: Can we go back to 14 Exhibit 20? 15 BY MR. BERRY: 16 Q. In Exhibit 20 you also see here 17 that -- I'm sorry. 18 With regards to the social media 19 statement at Exhibit 20, do you -- do you 20 understand this social media statement 21 as -- as requiring you to remove off-topic 22 comments? 23 A. No. 24 Q. And -- and why don't you think you're 25 required to under the statement?</p>
<p>58</p> <p>1 A. Yes, I would agree with that. 2 Q. And earlier you testified that -- that 3 you tried to remove all off-topic comments to 4 the best of your ability; correct? 5 A. Correct. 6 Q. So -- so why do you try to remove all 7 comments that are off topic when you're not 8 required to do so under this guidance? 9 A. I would say to be consistent as the 10 best that I can. Granted, social media posts 11 are living documents. So, you know, I -- I 12 don't -- you know, I might not see every 13 single comment. But to the best of my 14 ability, I try to be consistent and, you know, 15 provide equal treatment when possible. 16 Q. Have you always tried to remove all 17 off-topic comments to the best of your ability 18 since you started this role in -- in 2014, or 19 was there a point when you changed 20 your -- your behavior or philosophy? 21 A. My behavior or philosophy hasn't 22 changed. My philosophy hasn't changed. You 23 know, granted I've been in this role for more 24 than eight years. You know, I -- I'm not the 25 only one with access to the accounts.</p>	<p>60</p> <p>1 A. Under the statement it says that [as 2 read]: 3 "UW-Madison shall have the 4 right to remove any 5 content for any reason, 6 including, but not limited 7 to, the criteria listed." 8 There's -- it does not say there is a 9 requirement. But as understood, and in -- 10 as -- in my role as a social media manager, 11 that is part of my role to perform as -- you 12 know, all aspects of -- of account management. 13 And part of account management is content 14 moderation. 15 Q. And the reasons that says -- the 16 reasons that are included, but not limited to 17 under social media statement for moderation 18 are content that it deems -- that the 19 university deems to be threatening, profane, 20 obscene, violation of intellectual property 21 rights or privacy laws, off-topic, commercial, 22 or promotion of organizations or programs not 23 related to or affiliated with the university 24 or otherwise injurious or legal. 25 Is that a fair characterization?</p>

<p>61</p> <p>1 A. Yes, it is.</p> <p>2 Q. But the social media statement says</p> <p>3 that it can remove content for any reason,</p> <p>4 including, but not limited to, those reasons I</p> <p>5 just listed; correct?</p> <p>6 A. Correct. It says that.</p> <p>7 Q. Are there any other reasons, other</p> <p>8 than the ones listed, that you remove -- or</p> <p>9 excuse me.</p> <p>10 That you moderate comments for?</p> <p>11 A. At -- there might be at -- but it -- I</p> <p>12 tried to stick to the criteria within the</p> <p>13 statement. But it is possible that, you know,</p> <p>14 they have removed or hidden or -- or performed</p> <p>15 a moderation for other reasons, but it's a</p> <p>16 case-by-case basis.</p> <p>17 Q. With regards to the social media</p> <p>18 statement, have you -- did you ever undergo</p> <p>19 any sort of training for this social media</p> <p>20 statement at any -- at any time in your</p> <p>21 position as a social media manager?</p> <p>22 A. Training specific to this social media</p> <p>23 statement in particular?</p> <p>24 Q. Yes.</p> <p>25 A. I mean, when I -- when I started the</p>	<p>63</p> <p>1 statement, did your -- did your job training</p> <p>2 include any other discussions about social</p> <p>3 media?</p> <p>4 A. Yes, it did. Primarily covering</p> <p>5 content creation and just familiarizing myself</p> <p>6 with -- with the platforms that develop with</p> <p>7 the accounts that had already been created.</p> <p>8 Q. Was there anything else with regards</p> <p>9 to moderation, besides this social media</p> <p>10 statement when -- when you were training for</p> <p>11 your job?</p> <p>12 A. Not that I can recall.</p> <p>13 Q. And then subsequently to being</p> <p>14 onboarded for your current position,</p> <p>15 where -- were there any other trainings</p> <p>16 relating to social media moderation that</p> <p>17 you've undergone?</p> <p>18 A. Excuse me. In regards specifically to</p> <p>19 social media moderation, I don't believe so.</p> <p>20 But I've attended, you know, conferences, and</p> <p>21 seminars, and groups focused on social media</p> <p>22 throughout my employment as -- as part of my</p> <p>23 employment, and -- and role in this job on</p> <p>24 many different aspects of social media.</p> <p>25 But I don't recall -- or I'm not aware</p>
<p>62</p> <p>1 job and -- and, you know, was brought on</p> <p>2 board, I was introduced to the statement and</p> <p>3 the university relations, social media</p> <p>4 guidelines. And we, you know, we had a</p> <p>5 discussion about them. And -- so as part of</p> <p>6 my job onboarding, you know, the social media</p> <p>7 statement was -- was covered in that, I</p> <p>8 believe.</p> <p>9 Q. Do you remember -- can you describe</p> <p>10 what was -- what you were instructed about or</p> <p>11 trained on with regards to the social media</p> <p>12 statement?</p> <p>13 A. I -- I can't recall specifics about</p> <p>14 it. There was a lot of content covered. So,</p> <p>15 no, no, I can't recall.</p> <p>16 Q. Okay. And did the -- did your job</p> <p>17 onboarding and training include any -- any</p> <p>18 other instruction with regards to -- to social</p> <p>19 media, other than the social media statement</p> <p>20 or guidance?</p> <p>21 A. Any other training at all did you ask?</p> <p>22 Sorry.</p> <p>23 Q. Correct. Yeah. Was there -- other</p> <p>24 than the social media guidelines on the</p> <p>25 university relations page or this social media</p>	<p>64</p> <p>1 of any that are specifically about content</p> <p>2 moderation.</p> <p>3 Q. Okay. Have you ever had any -- any</p> <p>4 discussions with anyone at the university</p> <p>5 about how much discretion you have in deciding</p> <p>6 whether to restrict or moderate a comment on</p> <p>7 the university's social media pages?</p> <p>8 A. Yes, I have.</p> <p>9 Q. Can you describe those discussions</p> <p>10 with regards to who they were with?</p> <p>11 A. Yeah. Well, in my role I am</p> <p>12 the -- it's not an official title, but I</p> <p>13 would, you know, position myself as one of, if</p> <p>14 not the, lead social communicator on campus.</p> <p>15 And so employees look to me for</p> <p>16 guidance. And -- and we have many, many</p> <p>17 employees who manage social media accounts.</p> <p>18 And so I just -- I've had many different</p> <p>19 conversations.</p> <p>20 Typically speaking, we'll get</p> <p>21 questions, you know, relating to a specific</p> <p>22 user or a specific comment. But, yeah,</p> <p>23 it -- it's a case-by-case basis.</p> <p>24 Q. So it sounds like your -- you're</p> <p>25 saying that you're often the one people are</p>

<p>65</p> <p>1 going to ask for advice about moderation?</p> <p>2 A. Not always. But in my role, yes. I</p> <p>3 do have, you know, many communicators who do</p> <p>4 come to me.</p> <p>5 Q. And what sorts of -- what kinds of</p> <p>6 issues do people come to you with?</p> <p>7 A. A lot of different issues. Whether</p> <p>8 it's, you know, a functionality of, you know,</p> <p>9 I don't understand this new feature or how do</p> <p>10 I get more followers or, you know, optimizing</p> <p>11 social media posts for, like the Web or -- or</p> <p>12 for viewers, you know, when you're -- you</p> <p>13 know, when you're drafting a social media</p> <p>14 post, how it looks to the -- the public side</p> <p>15 of it as opposed to in draft form, and, you</p> <p>16 know, how visuals can -- can play into that.</p> <p>17 And like I said on, you know, specific</p> <p>18 comments or users for campaigns, I also</p> <p>19 produce many graphics. And -- and so I have</p> <p>20 folks coming to me asking to, you know, help</p> <p>21 give their -- give their campaign a boost,</p> <p>22 particularly as it related to COVID-19 and</p> <p>23 public health awareness as a recent example.</p> <p>24 Many, many different topics people come to me</p> <p>25 with.</p>	<p>67</p> <p>1 where other university communications staff</p> <p>2 would be considered the social media lead for</p> <p>3 the day, where they would be the ones -- or</p> <p>4 they would be the one kind of on point or in</p> <p>5 charge of outbound content for the day,</p> <p>6 editorial content.</p> <p>7 Where -- because just dealing with the</p> <p>8 COVID, and, you know, just ongoing emergency</p> <p>9 situation, I had many other aspects of my job</p> <p>10 to do, but didn't have the time or bandwidth</p> <p>11 for it. Excuse me.</p> <p>12 And so there would be -- there would</p> <p>13 be times where I would check in. You know,</p> <p>14 usually around the end of the day and see, you</p> <p>15 know, if there were any issues. You know, I</p> <p>16 can -- I can think of one specific one where I</p> <p>17 asked my colleague, Nick, you know, we</p> <p>18 were -- we were going through a -- what I</p> <p>19 would just colloquially consider, like a spam</p> <p>20 campaign.</p> <p>21 And I asked him, since Nick was</p> <p>22 serving as a social media lead for the day,</p> <p>23 and I hadn't had my eyes on social for most of</p> <p>24 the day, you know, if there were any, you</p> <p>25 know, words or phrases that kept -- were --</p>
<p>66</p> <p>1 Q. And do you ever go -- do you ever ask</p> <p>2 other people for guidance on moderating social</p> <p>3 media posts at the university?</p> <p>4 A. If I have questions about specifics</p> <p>5 I -- you know, probably contact legal.</p> <p>6 Q. Is there anyone, other than legal, who</p> <p>7 you would contact about -- about specific</p> <p>8 moderation situations?</p> <p>9 A. I might go to other social media</p> <p>10 managers, you know, who manage -- who also</p> <p>11 help manage the UW-Madison accounts or, you</p> <p>12 know, other -- other staff members within</p> <p>13 university communications, colleagues, who</p> <p>14 might be a subject matter expert in the</p> <p>15 particular, like, particular area where I have</p> <p>16 a question or that -- that can go for other</p> <p>17 university staff as well.</p> <p>18 Q. Can you give an example of a time</p> <p>19 where you sought out a colleague and -- and</p> <p>20 asked about a social media moderation</p> <p>21 situation?</p> <p>22 A. Yeah. I know they're out there.</p> <p>23 Sorry. I'm trying to think of one specific</p> <p>24 one.</p> <p>25 There would -- there would be times</p>	<p>68</p> <p>1 were being repeated that, you know,</p> <p>2 might -- we might consider to add to our</p> <p>3 auto-moderated list of words or phrases.</p> <p>4 Q. Okay. What was the -- do you remember</p> <p>5 what the spam campaign was about?</p> <p>6 A. No. I would need to see the</p> <p>7 conversation in front of me.</p> <p>8 Q. All right. Is spam -- how does spam</p> <p>9 fit into your social media moderation</p> <p>10 decision-making?</p> <p>11 A. Yeah. I would say that more often</p> <p>12 than not I would consider spam to be off</p> <p>13 topic.</p> <p>14 But in terms of what spam is, it's --</p> <p>15 it's usually directed by an outside source to,</p> <p>16 you know, go and comment on UW-Madison's</p> <p>17 social media accounts with a, you know,</p> <p>18 specific phrase or -- or whatever, and</p> <p>19 basically just jam up our comment sections,</p> <p>20 and, you know, where users will just pile on.</p> <p>21 And it becomes quite overwhelming as a social</p> <p>22 media manager.</p> <p>23 Q. What's overwhelming about reading</p> <p>24 several comments on your posts?</p> <p>25 A. It -- it can be overwhelming where</p>

<p>69</p> <p>1 you're receiving hundreds, if not thousands of 2 comments unrelated to the social media post at 3 hand when, for instance, if the -- the 4 comment -- or the -- sorry, the social media 5 post by UW-Madison is about, you know, current 6 public health guidance, and, you know, 7 student -- and were there -- you know, and 8 students might have questions that they're 9 looking to get answered. And it's sometimes 10 quite overwhelming to try and sift through all 11 of the spam or off-topic comments to try and 12 actually reach students who are trying to 13 engage in the specific social media post. 14 They're there to respond to the topic that 15 we're discussing in that social media post. 16 And there are times where I -- you 17 know, I -- I missed questions because we were 18 completely inundated by -- by spam commentors. 19 Q. You said sometimes there would be 20 hundreds of comments? 21 A. Yes. 22 Q. Okay. And how would you -- how do 23 you -- how do you handle those -- those 24 situations where you're receiving a lot of 25 comments that you -- that you consider to be</p>	<p>71</p> <p>1 not possible to do -- reasonably possible to 2 do by manual moderation, I'll look for a 3 keyword or phrase that, you know, consistent 4 -- it's consistently used in those comments. 5 And I'll add it to the auto moderated list. 6 It's -- you know, that's -- that's I 7 think -- I believe why the tool is there, to 8 help with situations like that. 9 Q. And when you put a word on the auto 10 moderated list, is there -- is there any sort 11 of practice with regards to removing those 12 words off the list at a future date? 13 A. Yeah. Words or phrases can come and 14 go. Some -- it really just depends on -- on 15 the -- the situation. 16 I might -- I might review the list of 17 words or phrases every few months. Or if, you 18 know, if I'm adding a new word or phrase, I 19 might look at the list and deem that oh, like, 20 you know, I'm -- that -- like that word or 21 phrase on the list, you know, might not really 22 be applicable to need auto moderated level 23 status. 24 And so I might remove it at that 25 point. But I don't -- I don't have a calendar</p>
<p>70</p> <p>1 off topic on a post? 2 How do you moderate those? 3 How do you moderate those comments? 4 A. It depends on the situation. But -- 5 and -- and it also depends on which platform 6 we're talking about, just because the 7 functionality of managing comments differs by 8 the platforms from an admin perspective. 9 But if, you know, if we are 10 receiving -- if we're in the middle of 11 a -- a -- you know, a spam campaign, I'll go 12 in and, you know, just assess the situation 13 and try to look for the source, you know, 14 where -- where is this directive coming from, 15 and just to try to better understand, you 16 know, the -- the motivation behind it or just, 17 you know, just the situation. 18 And then from there, if I can manually 19 moderate, depending on the level of -- of, you 20 know, look -- or the amount of comments 21 received, I -- or I might go in or 22 might -- you know, direct someone on -- on 23 staff to help me with manual moderation, 24 looking for off-topic comments. 25 Or otherwise if -- if it's -- if it's</p>	<p>72</p> <p>1 appointment or a timer to remind me to review. 2 It's just on an as-needed basis. 3 Q. What -- to the best of your ability, 4 can you recall any -- any and all words or 5 phrases that you had -- that you remember 6 removing from the auto-moderator, blocked-word 7 list? 8 A. The lists differ by Facebook and 9 Instagram. I -- I can't recall a specific 10 word or phrase. 11 Q. Okay. Do you -- I mean, how -- how 12 many times have you removed a word from 13 the -- from the list of auto moderated words? 14 A. I don't keep a count. 15 Q. If -- if you had to guess, would you 16 say it's been, you know, less than ten times 17 or more than ten times that you've removed a 18 word from the auto moderator? 19 A. Within -- within my time in this role, 20 probably more than ten times. 21 Q. Okay. Would you -- probably more than 22 ten times. So you're not -- you're not sure 23 if it's been more -- 24 A. I don't -- 25 (Indiscernible simultaneous</p>

<p>73</p> <p>1 colloquy.)</p> <p>2 BY MR. BERRY:</p> <p>3 Q. -- or less --</p> <p>4 A. I don't keep account. And the only</p> <p>5 record of-- of the words or phrases are</p> <p>6 within the list itself on the -- on Facebook</p> <p>7 or Instagram.</p> <p>8 I don't keep a separate list in like a</p> <p>9 Word doc or anything like that. So I-- I</p> <p>10 would -- I would guess more than ten times,</p> <p>11 but I -- I don't keep a record.</p> <p>12 Q. And excuse me.</p> <p>13 And how often -- excuse me.</p> <p>14 Do you have any practice -- let me</p> <p>15 rephrase that.</p> <p>16 Is there a -- is there a way to let a</p> <p>17 comment through to appear on a post even if it</p> <p>18 has an auto moderated word in the post?</p> <p>19 A. On Facebook, yes. On Facebook</p> <p>20 it -- it allows you to, you know, view -- as</p> <p>21 an admin, you can view all the comments. And</p> <p>22 it will -- if-- if there is a comment hidden,</p> <p>23 you can view the hidden comment and determine</p> <p>24 to take an action from that, whether that be</p> <p>25 to allow the -- to unhide the comment, to keep</p>	<p>75</p> <p>1 A. I can't recall the specific contents</p> <p>2 of -- of the comment itself. But there are</p> <p>3 certain instances where on Facebook I'll see</p> <p>4 that a comment is hidden and I'll expand it</p> <p>5 open. And it's just someone, you know,</p> <p>6 tagging -- tagging their friend's name in the</p> <p>7 comment. You know, and that's a common</p> <p>8 practice to, you know, try to get the</p> <p>9 attention of that friend to see the -- the</p> <p>10 Facebook post.</p> <p>11 And, I mean, we don't have specific,</p> <p>12 you know, names of regular people in our auto</p> <p>13 moderated list. So I'm not sure why Facebook</p> <p>14 hid that comment. And so I'll go and, you</p> <p>15 know, usually unhide it. Yeah.</p> <p>16 Q. Do you have any other examples or</p> <p>17 instances where you -- where you unhid an auto</p> <p>18 moderated comment on Facebook?</p> <p>19 A. A -- I can't think of a specific</p> <p>20 comment at a specific moment in time. But it</p> <p>21 is -- it is something that the act of</p> <p>22 reviewing is something that I do.</p> <p>23 Q. And on Instagram, there's no way to</p> <p>24 unhide -- [indiscernible] -- comment; is that</p> <p>25 right?</p>
<p>74</p> <p>1 it hidden, to delete the comment, to report</p> <p>2 the comment.</p> <p>3 Q. Do you have any practice on Facebook</p> <p>4 of un hiding comments that fell within the auto</p> <p>5 moderation, but which might happen to be on</p> <p>6 topic, despite being filtered out?</p> <p>7 A. Yeah. We regularly review hidden</p> <p>8 comments, or we regular -- regularly review</p> <p>9 comment sections. And if there is a hidden</p> <p>10 comment, you know, I -- if I -- if I see that</p> <p>11 there's a hidden comment. Because sometimes</p> <p>12 there are a lot of relevant comments</p> <p>13 that -- you know, I just -- so I do try to</p> <p>14 look at hidden comments to the best of my</p> <p>15 ability and determine, you know, is the auto</p> <p>16 moderator working as I intended it to.</p> <p>17 And if I do see that a comment that</p> <p>18 has been hidden is on topic as determined</p> <p>19 by -- or as is further clarified by the</p> <p>20 interim guidance, then I'll -- I'll go in and</p> <p>21 unhide it.</p> <p>22 Q. Can you provide a specific example of</p> <p>23 a time that you un hid a Facebook comment</p> <p>24 that -- that had been improperly auto</p> <p>25 moderated?</p>	<p>76</p> <p>1 STENOGRAPHER: I'm sorry.</p> <p>2 (Captured testimony read</p> <p>3 back.)</p> <p>4 MR. BERRY: An auto-moderated comment.</p> <p>5 BY MR. BERRY:</p> <p>6 Q. Is that correct?</p> <p>7 A. That's not correct.</p> <p>8 Q. Okay. Can you describe how to -- how</p> <p>9 to unhide a moderated comment on Instagram?</p> <p>10 A. In order to do -- in order to -- well,</p> <p>11 there are certain circumstances. So if</p> <p>12 the -- if an account level restriction has</p> <p>13 been placed on a user, then -- sorry. I lost</p> <p>14 my train of thought.</p> <p>15 For account level restrictions, if a</p> <p>16 user were to comment and it is visible to that</p> <p>17 user and the account administrator, wherein</p> <p>18 the account administrator then has the option</p> <p>19 to leave it hidden, approve it and unhide it,</p> <p>20 delete it, report it, those options.</p> <p>21 As for hidden -- as for hidden</p> <p>22 comments by the auto moderator, to unhide a</p> <p>23 comment you would need to remove that specific</p> <p>24 word or phrase from the auto moderated list.</p> <p>25 Q. Okay. All right. Thanks.</p>

<p>77</p> <p>1 And you said that you -- that -- you 2 mentioned that you review -- that you watch 3 the social media comments to decide what to 4 moderate or perhaps un -- unmoderate. Is it 5 that -- that's correct? 6 A. Yes. 7 Q. Can you just walk me through sort of a 8 typical day in -- you know, how -- how closely 9 you're watching this and... 10 A. How closely I'm watching what? 11 Q. Sorry. Walk me through a typical day 12 and just -- and just describe your -- your 13 process of monitoring comments with regards to 14 moderation? 15 A. Sure. It -- a typical day I usually 16 first meet with my supervisor, Mike, and we go 17 through the content for the day. And so 18 that's where I kind of go into the planning 19 phase of, you know, just what -- what outbound 20 content will feature on our accounts that 21 given day. 22 And then, you know, I'm checking 23 emails, you know, working with UW social 24 media, communicators as needed. 25 But as it -- as -- you know, as we</p>	<p>79</p> <p>1 evening, before bed. 2 But that's also in addition to 3 performing a lot of other duties in my role. 4 Q. If -- if somebody posts a comment that 5 that -- that's been auto moderated because it 6 has a blocked keyword or blocked word, do 7 you -- would you get a notification for that 8 comment when it's made? 9 A. The -- yeah. We -- well, sorry. 10 I -- I believe so, yes. And Facebook and 11 Instagram have both really improved 12 their -- their inbox in recent months. It 13 used to be really wonky. 14 But, yeah, a few months ago with -- 15 with Facebook's kind of switch to Meta as the 16 parent company, they did a complete overhaul 17 of their inbox, where we receive DMs 18 and -- and comment notifications. 19 And so they're much clearer now within 20 the past, I would say four or five months, 21 than what it used to be. 22 It was -- it was very glitchy. And I 23 would -- I would miss a lot of content. 24 Sorry. I don't know if it answered your 25 question or I don't know if I answered the</p>
<p>78</p> <p>1 regard reviewing comments, there -- like 2 reviewing comment -- or the notifications for 3 comments are in the same area of the account 4 manager as our direct message inbox for both 5 Facebook and Instagram, but it's in a 6 different tab. 7 So I'll usually watch for direct 8 messages, you know, throughout 9 the -- throughout the day we usually have a 10 few come in, you know, overnight. 11 And so in the morning -- as part of my 12 morning rounds, I'll try to review messages 13 and comments that came in throughout the 14 night. 15 And then monitoring comments, I'll 16 usually try to keep an eye on, you know, the 17 first few minutes just to see if there's 18 anything that pops up, somebody needs a 19 response right away, depending on the subject 20 matter. 21 And then, you know, if I -- well, 22 I'll -- you know, we probably review it 23 around, you know, 4:00 or 5:00 p.m. again, 24 both the inbox and comments we've received. 25 And then I -- I might check, you know, in the</p>	<p>80</p> <p>1 specific question you asked. 2 Q. That's okay. 3 With -- you said previously Facebook 4 was glitchy and that you -- it was hard to see 5 notifications when somebody was making a 6 comment? 7 A. Correct. 8 Q. Was -- did Instagram have 9 similar -- any similar problems? 10 A. Yeah. It was a similar functionally. 11 There would be times where the -- the desktop 12 tool just completely unusable. And so I had 13 to resort to monitoring on my phone. 14 Q. How often would you have to do that? 15 A. As-needed basis. But I would try to 16 use the desktop tool whenever -- whenever 17 possible, just because it's easier to use on a 18 larger screen than a smaller phone screen. 19 Q. And this would be for -- for watching 20 comments come in? 21 A. Comments, interactions, yeah. I 22 always just like to watch the like count just 23 to see -- you know, for strategy what time of 24 day to post content, or just how -- how 25 the -- how the Facebook or Instagram algorithm</p>

<p>81</p> <p>1 is treating our piece of content.</p> <p>2 Q. Other than the -- other than the</p> <p>3 desktop version of the moderator tools not</p> <p>4 working, what -- were there other glitches or</p> <p>5 technical problems that made it hard to</p> <p>6 moderate Facebook or Instagram in the past?</p> <p>7 A. Yeah. There -- there would be times</p> <p>8 where Instagram just wouldn't load comments</p> <p>9 for me, either on, you know, I'd -- I'd</p> <p>10 receive -- or I'd see that, you know, we had,</p> <p>11 say, 49 comments on something -- on a post on</p> <p>12 Instagram. But I would click in and would</p> <p>13 only see, you know, several.</p> <p>14 But then over time, maybe the next</p> <p>15 day, I would be able to see all 49. It wasn't</p> <p>16 consistent, but it had happened in the past.</p> <p>17 But in -- in recent months, both</p> <p>18 Facebook and Instagram had really improved.</p> <p>19 Q. How often would this happen where</p> <p>20 comments wouldn't show up for a day or so?</p> <p>21 A. I'd say less than a dozen.</p> <p>22 Q. Okay. If somebody -- if somebody made</p> <p>23 an on-topic post that was filtered by the auto</p> <p>24 moderator on an old post, would you get a</p> <p>25 notification for that?</p>	<p>83</p> <p>1 commented on an older post within -- with a</p> <p>2 comment that was auto moderated, would you get</p> <p>3 a notification.</p> <p>4 You said that was an area where</p> <p>5 Instagram and Facebook were historically more</p> <p>6 glitchy.</p> <p>7 So what -- what did you think I meant</p> <p>8 when I said "older"?</p> <p>9 A. When you said "older," I -- I took</p> <p>10 that as -- or I understood it as</p> <p>11 back -- I -- a comment on a post when Facebook</p> <p>12 and Instagram were more glitchy in their</p> <p>13 inbox.</p> <p>14 Q. Oh, I see. Okay.</p> <p>15 What if somebody -- what if somebody</p> <p>16 posted on -- would a notification behavior on</p> <p>17 Instagram or Facebook ever be different if</p> <p>18 somebody made a comment on, let's say a</p> <p>19 week-old Instagram post or Facebook post?</p> <p>20 A. Are we talking if the comment is made</p> <p>21 in present day?</p> <p>22 Q. Yes.</p> <p>23 A. I believe we would receive a</p> <p>24 notification either way.</p> <p>25 Q. Okay.</p>
<p>82</p> <p>1 A. That particularly is where both</p> <p>2 Facebook and Instagram were rather glitchy.</p> <p>3 Now, today, yes. But in the past, might. We</p> <p>4 might be able to see that in the -- in the</p> <p>5 inbox, but not always.</p> <p>6 Q. And when you say "that," do you mean</p> <p>7 any comments on an older post, or a comment</p> <p>8 from somebody who was being auto moderated?</p> <p>9 A. Oh, sorry. Any comment. Whether or</p> <p>10 not they were auto moderated.</p> <p>11 Q. So someone commented -- or</p> <p>12 historically, if someone commented on an older</p> <p>13 post, you might not get a notification for it</p> <p>14 on Facebook or Instagram?</p> <p>15 A. Might --</p> <p>16 MR. KILPATRICK: I'm going to object.</p> <p>17 I'm going to object as to the use of the term</p> <p>18 "old" as ambiguous.</p> <p>19 BY MR. BERRY:</p> <p>20 Q. You can answer the question.</p> <p>21 A. Might not. But, yeah, I -- I -- old,</p> <p>22 if you're referring to -- I'm not sure what</p> <p>23 you mean by "old."</p> <p>24 Q. Well, I -- if you -- just a minute ago</p> <p>25 I had asked if you would get -- if someone</p>	<p>84</p> <p>1 A. Granted, we receive sometimes hundreds</p> <p>2 of notifications, thousands of notifications</p> <p>3 every day depending just on -- on the level of</p> <p>4 engagement we receive.</p> <p>5 And so, eyes -- we might receive a</p> <p>6 notification, but eyes from an account manager</p> <p>7 might not fall on that notification itself.</p> <p>8 Q. If somebody commented on a week-old</p> <p>9 post in 2020, would you receive a normal</p> <p>10 notification for that on Facebook and</p> <p>11 Instagram?</p> <p>12 A. Generally speaking, yes. But given</p> <p>13 the glitchy behavior that I described earlier,</p> <p>14 I -- I can't guarantee that Facebook or</p> <p>15 Instagram would deliver that notification.</p> <p>16 Q. Would that glitchy behavior that you</p> <p>17 described apply to somebody commenting on a</p> <p>18 post on Facebook or Instagram that was posted</p> <p>19 the same day as their comment?</p> <p>20 A. In my experience with just that type</p> <p>21 of glitchy behavior, and when it came to</p> <p>22 notifications, Facebook and Instagram would be</p> <p>23 pretty good about recent -- so meaning day of</p> <p>24 or the day-before posts that were made by the</p> <p>25 university and notifications associated with</p>

<p>85</p> <p>1 that.</p> <p>2 But where it -- where it got glitchy</p> <p>3 was dealing with posts made a week or two</p> <p>4 prior and -- and further back.</p> <p>5 Q. Was this -- was this glitchy behavior</p> <p>6 something that was well known or discussed</p> <p>7 in -- among social media specialists?</p> <p>8 A. Yeah. I mean, so within the social</p> <p>9 media team that we've built in university</p> <p>10 communications, we would err a lot of</p> <p>11 grievances about the -- the, you know, the</p> <p>12 various Facebook tools and their level of</p> <p>13 reliability.</p> <p>14 Q. Did the glitchy behavior, did it have</p> <p>15 a name?</p> <p>16 A. I don't -- I don't believe so.</p> <p>17 Q. Okay. Are there any -- any online</p> <p>18 communities or Web pages that -- that -- that</p> <p>19 you -- that -- that talk about this sort of</p> <p>20 glitchy behavior with regards to comment</p> <p>21 notifications on Facebook or Instagram?</p> <p>22 A. I -- I belonged to several online</p> <p>23 communities and there might have been</p> <p>24 discussion in there. But given the time where</p> <p>25 this happened, I was mainly focused on just</p>	<p>87</p> <p>1 cleared out old, old messages that had been</p> <p>2 replied to, didn't -- we didn't need in our</p> <p>3 inbox anymore, cleared all that out, and just</p> <p>4 tried to just like have it start fresh.</p> <p>5 And that -- that seemed to work a bit.</p> <p>6 And then soon after that is when Meta kind of</p> <p>7 updated its -- its inbox.</p> <p>8 Q. Why would -- why would clearing out</p> <p>9 messages help resolve this glitch?</p> <p>10 A. It was just troubleshooting. I</p> <p>11 thought it might help.</p> <p>12 Q. Okay. Other than -- other than doing</p> <p>13 this cleaning up, were there any other -- any</p> <p>14 other resources or research that -- that you</p> <p>15 looked into to help resolve the -- the glitchy</p> <p>16 notification behavior that you were</p> <p>17 experiencing?</p> <p>18 A. I -- you know, I -- I follow -- or I</p> <p>19 don't follow, but I -- you know, I -- I look</p> <p>20 to certain, you know, tech publications that</p> <p>21 usually try to provide, you know, tips for</p> <p>22 social media platforms. And so I'm sure I</p> <p>23 performed a search or two just to look into</p> <p>24 the matter.</p> <p>25 But I -- to what I can recall, I</p>
<p>86</p> <p>1 campus operations. This was -- this was</p> <p>2 primarily, you know, beginning of the pandemic</p> <p>3 when it was -- when it was -- I would -- I</p> <p>4 would associate, you know, most of the -- or</p> <p>5 up -- up to the -- the update several months</p> <p>6 ago or whenever Meta took over and updated its</p> <p>7 inbox. Prior to that time the inboxes, you</p> <p>8 know, were rather glitchy.</p> <p>9 So there could be -- there could have</p> <p>10 been discussion, but I don't think I ever</p> <p>11 partook in those discussions within a broader</p> <p>12 community.</p> <p>13 Q. Did you ever -- did you ever take any</p> <p>14 steps to try to figure out what was causing</p> <p>15 this glitch?</p> <p>16 A. Yeah. I mean, I would try to -- you</p> <p>17 know, clear out the inbox every so often and,</p> <p>18 you know, just like check off notifications.</p> <p>19 I know there was -- I did a major</p> <p>20 sweep. It just got to the point of like, it</p> <p>21 was nearly, you know, it -- it barely</p> <p>22 functioned for us. January of 2021 we were</p> <p>23 missing -- we were missing a lot.</p> <p>24 And -- and so I went through just a</p> <p>25 huge, kind of like spring cleaning, and just</p>	<p>88</p> <p>1 didn't see any sure-fire fix to the situation.</p> <p>2 Q. Have you done any kind of -- have you</p> <p>3 done any kind of, like, cleaning up like that</p> <p>4 subsequently to the -- the time around</p> <p>5 January 2021 when you...</p> <p>6 A. Yes. So since then and -- yeah.</p> <p>7 Since then I have, you know, tried to maintain</p> <p>8 a much cleaner inbox so that we do have a</p> <p>9 higher probability of seeing new</p> <p>10 notifications.</p> <p>11 And just with the -- the redesign of</p> <p>12 the inbox, it's just much clearer and easier</p> <p>13 to -- to manage.</p> <p>14 Q. Do you have any kind of -- are there</p> <p>15 any policies at the university that guide your</p> <p>16 decision for cleaning up inboxes on social</p> <p>17 media accounts?</p> <p>18 A. We don't have any social media</p> <p>19 policies. We have the social media statement,</p> <p>20 and we have the social media guidelines, and</p> <p>21 the interim guidance from OLA or office of</p> <p>22 legal affairs. I...</p> <p>23 Q. Earlier you -- you mentioned that you</p> <p>24 can get hundreds or even thousands of</p> <p>25 interactions on social media every day that</p>

<p>89</p> <p>1 you're responsible for, for overseeing?</p> <p>2 A. Yes.</p> <p>3 Q. Can you -- do you keep metrics</p> <p>4 anywhere about precisely how many types of</p> <p>5 social media interactions you get on a given</p> <p>6 day or any period of time for that matter?</p> <p>7 A. We have metrics available to us as</p> <p>8 account managers. Facebook and Instagram, you</p> <p>9 know, provide metrics.</p> <p>10 But I -- I am not as producing --</p> <p>11 analytics and metrics are not within my</p> <p>12 day-to-day or even weekly or monthly job</p> <p>13 requirements.</p> <p>14 Q. How did you arrive at the -- at the</p> <p>15 range of hundreds to thousands a day of social</p> <p>16 media interactions that that could happen?</p> <p>17 A. I remember seeing several Instagram</p> <p>18 posts where it said more -- you know, more</p> <p>19 than 1,000 comments for a -- a post that was</p> <p>20 made within that day or two and tracking</p> <p>21 downward.</p> <p>22 Q. Do you remember what -- what that post</p> <p>23 was about?</p> <p>24 A. I don't recall, no.</p> <p>25 Q. Do you remember what the comments were</p>	<p>91</p> <p>1 accounts?</p> <p>2 A. I look at the -- the number of likes</p> <p>3 or reactions. I can also see the amount of</p> <p>4 shares and interactions and comments on those</p> <p>5 shares. And I -- I think I previously defined</p> <p>6 what "sharing" means.</p> <p>7 Also, yeah, you know, I can run like</p> <p>8 Google searches with the URL of the specific</p> <p>9 post to see what kind of media pickup we might</p> <p>10 be getting, you know, if someone has embedded</p> <p>11 one of our social media posts in their news</p> <p>12 story or -- or Web story, whatever that might</p> <p>13 be.</p> <p>14 Q. So you're actively monitoring all --</p> <p>15 all of those different types of interactions</p> <p>16 on social media as, you know, on a daily</p> <p>17 basis; is that right?</p> <p>18 A. Yeah. That's -- that's what I would</p> <p>19 consider social listening, which is just kind</p> <p>20 of monitoring traffic in all shapes and forms.</p> <p>21 Excuse me.</p> <p>22 Q. Is anyone responsible for moderating</p> <p>23 social media comments on the university's</p> <p>24 social media pages, other than you?</p> <p>25 A. What do you mean by "responsible"?</p>
<p>90</p> <p>1 about?</p> <p>2 Why were there so many comments on</p> <p>3 that one?</p> <p>4 A. Well, we can receive, you know, many</p> <p>5 notifications for a number of reasons. Say we</p> <p>6 win a national championship or a sports team</p> <p>7 does really well or, you know, the university</p> <p>8 has a high ranking in a certain, you know,</p> <p>9 U.S. News or Washington monthly ranking for or</p> <p>10 either the full university or a, you know,</p> <p>11 particular program or aspect.</p> <p>12 Other times it's from spam campaigns</p> <p>13 that I described earlier.</p> <p>14 Q. Sometimes you receive thousands of</p> <p>15 comments that are related to what you describe</p> <p>16 as a spam campaign, but other times you may</p> <p>17 receive thousands of comments on a post that</p> <p>18 doesn't -- is not related to what you would</p> <p>19 call a spam campaign; is that right?</p> <p>20 A. I don't think I would characterize it</p> <p>21 that way. I mean, there are -- I can't put an</p> <p>22 entire comment section into one -- one bucket.</p> <p>23 Q. Other than comments, what other kinds</p> <p>24 of interactions do you watch as -- as they</p> <p>25 occur on your university social media</p>	<p>92</p> <p>1 Q. Does anyone else moderate comments on</p> <p>2 the university's social media page besides</p> <p>3 you?</p> <p>4 A. Yes. Mike Klein who is my supervisor.</p> <p>5 And prior to the interim guidance, you know,</p> <p>6 whoever was the social media lead for that day</p> <p>7 would typically handle just the all</p> <p>8 aspect -- you know -- you know, posting</p> <p>9 outbound content and monitoring comments.</p> <p>10 They had the ability to moderate</p> <p>11 comments. Usually there would be a</p> <p>12 discussion, you know, if a question came up.</p> <p>13 You know, but Mike and I ultimately took</p> <p>14 responsibility for those and -- and would, you</p> <p>15 know, consult as necessary if we were able to</p> <p>16 handle it, you know, within the social media</p> <p>17 team.</p> <p>18 Q. Can you describe Mike Klein's role</p> <p>19 in -- in moderating on -- in particular</p> <p>20 what -- under what circumstances would Mike</p> <p>21 Klein be involved in a moderating activity?</p> <p>22 A. If he was social media lead for the</p> <p>23 day or if he in his own capacity was reviewing</p> <p>24 social media comments or the inbox where we</p> <p>25 received notifications for those at any time,</p>

Transcript of Nate Moll
Conducted on March 9, 2022

24 (93 to 96)

<p>93</p> <p>1 yeah.</p> <p>2 Q. And -- and you mentioned that</p> <p>3 after -- it was after the interim social media</p> <p>4 policy came out that the student interns</p> <p>5 stopped having the authority to moderate</p> <p>6 comments; is that accurate?</p> <p>7 A. No. The -- we received interim social</p> <p>8 media guidance from office of legal affairs.</p> <p>9 It's -- it's not a policy. And we don't</p> <p>10 actively have any intern -- student interns in</p> <p>11 managing any aspect of our university social</p> <p>12 accounts.</p> <p>13 Q. And why -- why don't you have interns?</p> <p>14 A. For a while during the pandemic we had</p> <p>15 a hiring freeze, and -- and so</p> <p>16 it -- everything fell to the professional</p> <p>17 staff -- or I shouldn't say fell to. But</p> <p>18 that -- the -- the professional staff who we</p> <p>19 already hired or already employed before the</p> <p>20 hiring freeze, just had to take over all, you</p> <p>21 know, account aspects.</p> <p>22 We -- we didn't -- we didn't have any</p> <p>23 student interns to help with content creation</p> <p>24 or account management in any way. And I</p> <p>25 just -- while we're still in the pandemic,</p>	<p>95</p> <p>1 THE WITNESS: I can easily do that.</p> <p>2 MR. KILPATRICK: Sorry. Maybe we</p> <p>3 should do 45 minutes, then.</p> <p>4 THE WITNESS: Is 1:30, does that</p> <p>5 sound -- kind of meet in the middle there.</p> <p>6 MR. BERRY: Let's not -- let's do</p> <p>7 1:35.</p> <p>8 MR. KILPATRICK: Okay. 1:35 central</p> <p>9 time.</p> <p>10 MR. BERRY: Central time, yep.</p> <p>11 VIDEOGRAPHER: Okay. I'll bring us</p> <p>12 off the record.</p> <p>13 The time is 12:53. We're off the</p> <p>14 record at the end of recording 2.</p> <p>15 (A short recess was had.)</p> <p>16 VIDEOGRAPHER: The time is 1:35.</p> <p>17 We're on the record at the start of recording</p> <p>18 3.</p> <p>19 MR. BERRY: Welcome back.</p> <p>20 Can we get Exhibit 21 back on</p> <p>21 the -- on the screen?</p> <p>22 And can we scroll down -- well,</p> <p>23 actually, stop there for a moment.</p> <p>24 Okay. That's good.</p> <p>25</p>
<p>94</p> <p>1 just haven't had the bandwidth to work on</p> <p>2 hiring more students yet.</p> <p>3 Q. And there -- you testified earlier, if</p> <p>4 I recall correctly, that -- that the last time</p> <p>5 you had interns was May 2021; is that</p> <p>6 accurate?</p> <p>7 A. 2020.</p> <p>8 Q. 2020, okay.</p> <p>9 A. May 2020, yes.</p> <p>10 Q. All right. Well, I think we can -- I</p> <p>11 know there was a request to break for lunch</p> <p>12 around now. I'm happy -- I'm happy to break.</p> <p>13 You know, is it -- is 35 minutes enough? I</p> <p>14 know people might have other oblig- -- we</p> <p>15 could go -- we could go to like -- what would</p> <p>16 that be, 1:45 if we need to.</p> <p>17 MR. KILPATRICK: I don't need that</p> <p>18 much. But, you know, 30 -- 30 minutes would</p> <p>19 be enough for me. But I'll defer to -- to</p> <p>20 Nate, if that's enough for him.</p> <p>21 THE WITNESS: Yeah. I -- 30 minutes</p> <p>22 is fine for me. I probably will need to run</p> <p>23 down the hill to -- to grab something to eat.</p> <p>24 MR. KILPATRICK: Then maybe we</p> <p>25 should --</p>	<p>96</p> <p>1 BY MR. BERRY:</p> <p>2 Q. Mr. Moll, at the bottom of the page,</p> <p>3 Exhibit 21 here, this is the -- the interim</p> <p>4 guidance. It states that [as read]:</p> <p>5 "To the extent that a --</p> <p>6 users post on-topic</p> <p>7 content that is</p> <p>8 inaccurate, misleading or</p> <p>9 critical of UW-Madison, or</p> <p>10 any of its subunits to a</p> <p>11 formally affiliated</p> <p>12 UW-Madison social media</p> <p>13 page, social media</p> <p>14 managers may respond</p> <p>15 either with a reply or</p> <p>16 separate post. In these</p> <p>17 responses, social media</p> <p>18 managers may clarify an</p> <p>19 institutional position on</p> <p>20 the topic, provide context</p> <p>21 or factual information,</p> <p>22 and link to resources</p> <p>23 where users can find</p> <p>24 additional information."</p> <p>25 Do you agree that's an accurate</p>

<p>97</p> <p>1 representation of that paragraph?</p> <p>2 A. Yes, I do.</p> <p>3 Q. How would you determine if a -- if an</p> <p>4 on-topic comment was inaccurate?</p> <p>5 A. There are a few different ways I could</p> <p>6 determine that, based on my own institutional</p> <p>7 knowledge from the time that I have spent here</p> <p>8 in my professional role and -- and as an</p> <p>9 undergrad.</p> <p>10 Or, you know, quite often, I will, you</p> <p>11 know, consult a KB document or knowledge-based</p> <p>12 document, which that's just -- I kind of think</p> <p>13 of it as like the Wikipedia of UW-Madison.</p> <p>14 Or I can consult a subject matter</p> <p>15 expert with the -- you know, the information</p> <p>16 or the comments at hand.</p> <p>17 Q. And similarly, how would you determine</p> <p>18 if an on-topic comment was critical of the</p> <p>19 university?</p> <p>20 A. I'd say it's a case-by-case basis. It</p> <p>21 depends on what the content of the comment is.</p> <p>22 Q. Have you ever -- have you ever</p> <p>23 responded with a reply or a separate post</p> <p>24 to -- to on-topic content that was inaccurate,</p> <p>25 misleading, or critical?</p>	<p>99</p> <p>1 There were -- excuse me -- there were</p> <p>2 projection-style advertisements around</p> <p>3 Madison, around, you know, downtown Madison.</p> <p>4 But it did not occur on a university building.</p> <p>5 And so I -- I ran a reply -- or at least I</p> <p>6 directed whoever was the social media lead of</p> <p>7 that day to run a reply to that person</p> <p>8 clarifying that it did not -- it did not</p> <p>9 happen at the university -- on a university</p> <p>10 building.</p> <p>11 Q. Do you remember -- do you recall any</p> <p>12 other incidents where you responded to an</p> <p>13 inaccurate, misleading, or critical comment?</p> <p>14 A. Yeah. There are times where a</p> <p>15 particular instructor will, you know, be in</p> <p>16 the news cycle for any reason. And so there</p> <p>17 will be a -- well, you know, we'll sometimes</p> <p>18 see a comment to, you know, fire said</p> <p>19 professor or, you know, take action against</p> <p>20 that professor or instructor.</p> <p>21 And -- and sometimes that instructor</p> <p>22 or professor is not employed by UW-Madison.</p> <p>23 Sometimes it's a completely different</p> <p>24 university -- or outside of the UW system or</p> <p>25 sometimes, you know, the -- the -- wherever</p>
<p>98</p> <p>1 A. Yes, I have.</p> <p>2 Q. And how often have you -- have you</p> <p>3 responded with a reply or a separate post with</p> <p>4 such content?</p> <p>5 A. Yeah. I -- I don't keep a count or</p> <p>6 analytics of, you know, what types of replies</p> <p>7 I run. But in my time in this role for more</p> <p>8 than eight years, I would say more than a</p> <p>9 dozen.</p> <p>10 Q. Okay. And can you provide details</p> <p>11 about -- about those comments where you</p> <p>12 replied or created a separate post that</p> <p>13 described the nature of -- of the comment and</p> <p>14 the nature of the response?</p> <p>15 A. Excuse me. A -- I remember one</p> <p>16 specific comment -- or I recall one that I can</p> <p>17 speak about. There -- there was a rumor or</p> <p>18 someone commented that a political candidate</p> <p>19 was projecting a political ad on one of our</p> <p>20 campus buildings, and, you know, felt that it</p> <p>21 was critical -- or it seemed to be a critical</p> <p>22 comment. They were criticizing the university</p> <p>23 for supporting that -- that kind of, you know,</p> <p>24 advertisement.</p> <p>25 However, that -- that was untrue.</p>	<p>100</p> <p>1 this commentor is getting their information</p> <p>2 from, that source, you know, stopped short of</p> <p>3 saying which University of Wisconsin campus at</p> <p>4 which that instructor is employed.</p> <p>5 And -- and so, you know, sometimes if,</p> <p>6 you know, if we receive comments like that,</p> <p>7 sometimes we'll run a reply saying this</p> <p>8 instructor is not employed by the University</p> <p>9 of Wisconsin Madison. They are -- and, you</p> <p>10 know, could provide additional information,</p> <p>11 like they are employed at a different</p> <p>12 institution.</p> <p>13 Q. And would those comments criticizing</p> <p>14 an instructor, were they in response to a post</p> <p>15 about the instructor?</p> <p>16 A. None which I can recall, no.</p> <p>17 Q. Do you remember what the posts were</p> <p>18 where these comments about instructors</p> <p>19 appeared?</p> <p>20 A. I -- I don't recall, no.</p> <p>21 Q. Is it possible that the posts where</p> <p>22 people were commenting about an instructor</p> <p>23 were not specifically about that instructor?</p> <p>24 A. Sorry. Could you repeat the question?</p> <p>25 Q. Is it possible -- is it possible if</p>

<p>101</p> <p>1 the posts were not about the instructor, even 2 though they were receiving comments about the 3 instructor? 4 A. Yes, that's possible. 5 Q. Okay. And then in a situation like 6 that, why -- why wouldn't you just remove the 7 post for being off topic? 8 Excuse me. I misspoke. 9 In a situation like that, why wouldn't 10 you remove the comment for being off topic? 11 MR. KILPATRICK: Objection. I'm going 12 to object. It's a hypothetical question to 13 which he didn't respond -- never said he would 14 not remove it. 15 BY MR. BERRY: 16 Q. Answer the question. 17 A. I -- I do recall in -- about the 18 projection misinformation that this 19 was -- this occurred on Facebook, and this 20 was, you know, just a one -- one question that 21 we received about it. 22 And so I guided the social media lead 23 at the time to, you know, reply correcting 24 that -- that person -- or at that commentor. 25 And I -- I believe I directed them to</p>	<p>103</p> <p>1 point -- you know, make -- point any more 2 attention at that comment. It had nothing to 3 do with the original post. Yeah. 4 Q. So -- so sometimes for an off-topic 5 comment, you may do a response, and sometimes 6 you might hide it? 7 A. Yes. That has occurred in the past. 8 Q. And is -- is that -- is that 9 decision -- whether to moderate a comment or 10 whether to respond to it, one that's in your 11 discretion, or is that somebody else that 12 makes that decision? 13 A. It could be mine. It could be Mike 14 Klein. It could be John Lucas. 15 Q. Okay. Can a -- 16 MR. BERRY: We can -- if we can, take 17 that exhibit off the screen. 18 BY MR. BERRY: 19 Q. The university -- the social media 20 pages is for the university in general; right? 21 A. Yes. It represents like the top level 22 university on social media. 23 Q. Can a comment that criticizes the 24 university for practices that the university 25 implements ever be off topic on a university</p>
<p>102</p> <p>1 then kind of hide the comment. And that was 2 because, A, the comment itself was off topic, 3 but it was just very easy to, you know, matter 4 of factually say, this did not happen. 5 But when -- like as I've kind of 6 built -- described the algorithm before, 7 Facebook and Instagram will sometimes, you 8 know, sort comments by default by, like the 9 most relevant or top comments. However 10 Facebook or Instagram determines that, I'm not 11 sure. 12 But from my experience, I have seen on 13 Facebook where if the university does reply to 14 a comment on one of its posts, Facebook will 15 automatically bring that comment kind of to 16 the -- the top of the list. 17 And so because, you know, this -- this 18 comment was off topic, but it was just very 19 easy to, you know, run a reply and correct, 20 and, you know, make a factual statement. 21 I -- I directed the social media lead 22 to make -- to make that comment, but then hide 23 that comment, I guess, thread, so that it 24 didn't go to the top of that comment section. 25 Because there really wasn't a reason to</p>	<p>104</p> <p>1 page or on a university post rather? 2 A. On an individual post, yes. It can be 3 off-topic. 4 Q. So you make that determination on the 5 post, and not -- not -- not with regard to the 6 account being about the university in general? 7 A. Correct. I make that determination 8 based on the individual's social media posts 9 made by the university. 10 Q. Could comments that are -- that 11 praised the university in general, would those 12 be off topic if they occurred on a post that 13 wasn't about the university? 14 A. I guess, yeah. I mean, it's -- it's 15 tough to say. It really depends on -- on 16 the -- the contents of the -- of -- of the 17 comment. You know, I can -- you know, 18 for -- for instance, sometimes, you know, 19 we'll -- we'll post about a recent university 20 ranking. And I'll -- we'll use the phrase in 21 our social media copy, like, "say it with us 22 on Wisconsin," with which is a general phrase 23 that's associated with the university. That's 24 kind of like a you-rah-rah-style comment. 25 And so, like, a comment doesn't</p>

<p>105</p> <p>1 necessarily have to contain words included in 2 the university's social media post to be 3 determined to be on topic. 4 For instance, like I had mentioned 5 before, you know, if a user will comment and 6 tag one of their friends, a -- I mean, what I 7 have described, you know, the -- the top 8 comments versus all comments or how Facebook 9 or Instagram kind of ranks those comments, 10 those always fall to the bottom as the least 11 relevant as I've -- as I've seen how Facebook 12 kind of ranks those. 13 But, you know, me tagging at, you 14 know, Christopher Berry in -- in a comment, 15 it's my intent that you look at this specific 16 social media post to get your attention to 17 look at it. 18 Q. And even -- even if -- even if someone 19 is not tagging one of their friends, could 20 they respond to a post and be -- and be on 21 topic for that post, even if -- even if 22 their -- their comment doesn't use the same 23 words as the post or include any of those same 24 words as the post? 25 MR. KILPATRICK: Objection;</p>	<p>107</p> <p>1 or off topic. 2 Q. So the university had several 3 controversies concerning racial inequity in 4 the past year; is that -- is that correct? 5 A. Generally, yes. 6 Q. And -- and to your knowledge, have 7 comments made on the university's Instagram or 8 Facebook pages criticizing the university's 9 practices with regards to racial inclusivity? 10 Yeah. So have comments been made on 11 the university's Instagram social media pages 12 criticizing the university's practice with 13 regards to racial inclusivity? 14 A. I believe I have seen comments about 15 that, yes. 16 Q. And had those comments always been 17 made on posts on the university's accounts 18 that relate to race or diversity? 19 A. I -- I can't answer without looking at 20 a specific comment. 21 Q. Okay. And have you ever moderated 22 comments criticizing the university's 23 practices with regards to -- to racial 24 inclusivity for any reason? 25 A. It's a really broad topic. Again,</p>
<p>106</p> <p>1 speculation. 2 BY MR. BERRY: 3 Q. You can answer the question. 4 A. I -- I don't know if I understand the 5 question. Could you please rephrase it? 6 Q. Does a comment have to include the 7 same words as the post in order for it to be 8 on topic? 9 A. It doesn't have to. It's not a 10 requirement. 11 Q. Does it have to -- so does a comment 12 have to include any synonyms of words in the 13 post to be on topic? 14 A. No. 15 Q. And so -- so what standard do you use 16 to determine whether something is on topic or 17 off topic? 18 A. Context in -- yeah, you need to just 19 look at the context. 20 Q. When you say that -- that you need to 21 look at the context, you mean you or whoever 22 is moderating that particular -- 23 A. Correct. When considering 24 a -- moderating a social media comment, you 25 need to look at the context of it for being on</p>	<p>108</p> <p>1 I -- I would need to see the context of -- of 2 the comment in question. 3 MR. BERRY: Can we pull up and mark as 4 Exhibit 22, the November 17, 2020, Instagram 5 post? 6 (Whereupon, Moll Deposition 7 Exhibit No. 22 was marked 8 for identification.) 9 BY MR. BERRY: 10 Q. So I can represent this a screenshot 11 of the university's @UW-Madison Instagram page 12 reflecting a post made on November 17, 2020. 13 Do you recall this post? 14 A. Yes, I do. 15 Q. And what's the topic of this post? 16 A. Can I get a moment to read the -- the 17 caption of it? 18 Q. Take your time, yes. 19 A. Thank you. 20 Okay. So this is an Instagram post 21 about COVID-19 public health guidance directed 22 towards students as we approach the 23 Thanksgiving recess and winter break. 24 Q. And you can see one comment from the 25 screenshot. What's the topic of the content?</p>

<p>109</p> <p>1 A. The topic of the -- the comment or -- 2 Q. Correct. What's -- what's the topic 3 of the -- of the one comment visible on this 4 exhibit? 5 A. It says [as read]: 6 "Shut down the money 7 laboratories." 8 With three, looks like sad face 9 emojis. 10 Q. Does that -- does that relate to the 11 topic of the post? 12 A. No, it does not. 13 Q. And why -- why would this comment 14 still be visible, then, even if it -- even if 15 it is not relating to the topic of the post? 16 A. I -- I don't know when this screenshot 17 was made. As I mentioned before, social media 18 comment -- or social media posts are living 19 documents, and so I'm not sure. 20 Q. In general, you would have received a 21 notification that -- the day that the comment 22 was made, even if that comment was made 23 after -- long after the post was created; is 24 that correct? 25 A. Looking at -- so the post was made</p>	<p>111</p> <p>1 reviewed that comment when they received a 2 notification for it, to the best of their 3 ability, of course. Is that -- that's correct 4 as well? 5 A. I would say so, yes. 6 Q. Okay. 7 A. But we -- we don't watch notifications 8 as they occur. It's usually playing catch-up 9 or sometimes just not seeing it at all. 10 There -- yeah. 11 Q. Mm-hmm. Okay. Now, there -- I can 12 represent, there are comments that aren't 13 visible because this is just one -- one small 14 screenshot of the post. 15 But the -- the university did produce 16 some -- some additional comments to this 17 particular post. 18 MR. BERRY: So I'd like to pull those 19 up and mark as Exhibit 23, UW0242. 20 (Whereupon, Moll Deposition 21 Exhibit No. 23 was marked 22 for identification.) 23 BY MR. BERRY: 24 Q. Are you famil- -- are you familiar 25 with this document?</p>
<p>110</p> <p>1 67 weeks ago on November 17, 2020. And the 2 comment below was made six weeks later. We 3 likely would have received a notification. 4 But I can't guarantee that, you know, any 5 eyes -- you know, that any social media 6 managers specifically saw that notification 7 about this specific comment. 8 Q. Is it a -- is it the practice to 9 review every comment as it comes in on -- on 10 social media posts? 11 A. As I said before, to the best of our 12 ability, try to, you know, monitor and -- and, 13 you know, practice social listening to review 14 comments. 15 But -- and again, that's to the best 16 of our ability. Just -- we are a large 17 account and don't always see every single 18 comment. 19 Q. So -- so Instagram should have 20 provided a notification for this, even though 21 it occurred six weeks after the original post; 22 is that correct? 23 A. Should have. And I -- yeah. 24 Q. And -- and whoever was responsible 25 for -- for listening that day should have</p>	<p>112</p> <p>1 A. I've seen this document before. 2 Q. And what -- and what -- and what is 3 this document marked as Exhibit 23? 4 A. This is a screenshot of a comment 5 section on Instagram. 6 Q. Okay. And I can represent that these 7 comments are posted to the November 17, 2020, 8 post that we just had up as Exhibit 22, 9 according to -- to the university's 10 interactions with us in this case. 11 Do you have any reason to doubt that 12 representation? 13 A. I can't verify it myself. But I -- I 14 trust that you're representing it accurately. 15 Q. So we'll proceed with the assumption 16 that these comments are in response to 17 that -- 18 A. Yeah. 19 Q. -- Exhibit 2020 -- excuse me, the 20 Exhibit 22 post. 21 There are three comments at the bottom 22 that I'm interested in, the last three. So 23 let's -- let's take a look at those. 24 What -- what's the -- what is the 25 topic of the -- of the first of the three</p>

<p>113</p> <p>1 comments by a user named Sarah?</p> <p>2 A. This comment is inquiring about</p> <p>3 students of color, and in relation to a</p> <p>4 specific employee on campus.</p> <p>5 Q. Is that -- is that the controversy</p> <p>6 around an instructor that we were talking</p> <p>7 about a little -- a little bit ago?</p> <p>8 A. I -- in my recollection earlier, I</p> <p>9 wasn't referring to this specific instructor</p> <p>10 or employee. I -- I couldn't tell you which</p> <p>11 employee this -- at this time. I couldn't</p> <p>12 tell you which employee this was about since</p> <p>13 this occurred in November 2020.</p> <p>14 Q. Okay. But it is about protecting</p> <p>15 students of color from an employee?</p> <p>16 A. Yeah, yes.</p> <p>17 Q. Yes. And the -- and the comment after</p> <p>18 that, can you describe what the -- what the</p> <p>19 topic around that comment is?</p> <p>20 A. I would assume in a similar vein,</p> <p>21 protecting, you know, students of color.</p> <p>22 Q. And they -- and they use an acronym</p> <p>23 there, BIPOC. Do you have an understanding</p> <p>24 of -- of what that acronym refers to, either</p> <p>25 what it means specifically or just what it</p>	<p>115</p> <p>1 A. That comment was moderated because the</p> <p>2 user had an account level restriction placed</p> <p>3 on it.</p> <p>4 Q. Okay. That looks like there's an</p> <p>5 option there to approve or delete?</p> <p>6 A. Correct.</p> <p>7 Q. And fair to assume that that comment</p> <p>8 had not been approved to appear on the page,</p> <p>9 that it had remained auto moderated; correct?</p> <p>10 A. Correct.</p> <p>11 Q. And that -- that all three of those</p> <p>12 comments you -- you would have received</p> <p>13 notifications when these comments were made?</p> <p>14 A. Yes.</p> <p>15 Q. I also -- for each of those three</p> <p>16 comments there's a -- below them on each one</p> <p>17 says "12W." Do you see where it says that?</p> <p>18 A. Yes.</p> <p>19 Q. And so what does that indicate?</p> <p>20 A. That indicates the -- that the comment</p> <p>21 was made 12 weeks ago. So 12 weeks since this</p> <p>22 screenshot was taken.</p> <p>23 Q. Okay. So would -- would it be fair to</p> <p>24 say that if -- if there was going to be any</p> <p>25 moderation decision with regards to the</p>
<p>114</p> <p>1 refers to generally?</p> <p>2 A. Yes, I do.</p> <p>3 Q. And what is that understanding that</p> <p>4 you have?</p> <p>5 A. Well, black, indigenous, or people of</p> <p>6 color, BIPOC.</p> <p>7 Q. Okay. And then can you read the last</p> <p>8 comment then, the one at the very bottom of</p> <p>9 that Exhibit 23?</p> <p>10 A. [As read]:</p> <p>11 "@UW-Madison, close down</p> <p>12 your primate research</p> <p>13 labs."</p> <p>14 Q. Okay. So were any of those comments</p> <p>15 moderated?</p> <p>16 A. At that time of the screenshot, the</p> <p>17 bottom comment was moderated.</p> <p>18 Q. And -- but the other two comments</p> <p>19 relating to students of color, those were not</p> <p>20 moderated; is that correct?</p> <p>21 A. At the time of the screenshot, no.</p> <p>22 Q. Okay. And why -- why was that -- why</p> <p>23 was that comment at the bottom, "close down</p> <p>24 your primate research labs"?</p> <p>25 Why was that comment moderated?</p>	<p>116</p> <p>1 particular comment, that those would -- that</p> <p>2 those would have occurred 12 weeks ago when</p> <p>3 the comments were made?</p> <p>4 A. Sorry. Could you repeat that</p> <p>5 question?</p> <p>6 Q. What -- wouldn't it be -- would it be</p> <p>7 fair to say that if any moderation to</p> <p>8 the -- either to moderate or to unmoderate one</p> <p>9 of those comments was going to be made, that</p> <p>10 that -- that that moderation decision would</p> <p>11 have been made 12 weeks prior to the</p> <p>12 screenshot?</p> <p>13 A. Generally, we -- we try to stay active</p> <p>14 on our most recent, you know, Facebook or</p> <p>15 social media posts.</p> <p>16 But, yes, sometimes we -- we don't get</p> <p>17 all of them, or don't review all of them.</p> <p>18 Q. How often would you say you go back</p> <p>19 and mod- -- make any kind of moderation</p> <p>20 decision with regards to a 12-week-old</p> <p>21 comment?</p> <p>22 A. Not very often.</p> <p>23 Q. Is it -- is it the practice to</p> <p>24 moderate -- to make a moderation decision on</p> <p>25 the comment as they come in as they receive</p>

<p>117</p> <p>1 notifications about them?</p> <p>2 A. Most often as they come in or after a</p> <p>3 period of a few hours based on the workday and</p> <p>4 the workload associated with that workday.</p> <p>5 Q. So typically, a moderation decision</p> <p>6 to -- with regards to a comment would be made</p> <p>7 within a day of the comment being made?</p> <p>8 A. I would say within several days.</p> <p>9 Q. Okay. So with regards to</p> <p>10 the -- what -- would you say that the two</p> <p>11 comments about -- about protecting students of</p> <p>12 color, are those -- are those on topic with</p> <p>13 regards to the staying safe from COVID during</p> <p>14 Thanksgiving break, are those on-topic</p> <p>15 comments or off-topic comments?</p> <p>16 A. I don't know the nature of the</p> <p>17 complaint of the employee. And so I -- I</p> <p>18 can't determine whether or not it's on or off</p> <p>19 topic.</p> <p>20 Q. Could you imagine a circumstance under</p> <p>21 which an employee could be endangering the</p> <p>22 students with regards to COVID?</p> <p>23 A. Yes, I could.</p> <p>24 Q. Okay. And can -- I mean, can you just</p> <p>25 describe what that situation might look like</p>	<p>119</p> <p>1 in that comment?</p> <p>2 A. In that jatzyy comment there is --</p> <p>3 there is no specific reference to a university</p> <p>4 employee.</p> <p>5 Q. So the only reason that they could be</p> <p>6 considered on topic is because it might be</p> <p>7 relating to something having to do with COVID,</p> <p>8 but you -- you wouldn't know that by looking</p> <p>9 at the comment that it had anything to do with</p> <p>10 COVID; is that fair to say?</p> <p>11 A. At this time, I -- I wouldn't know.</p> <p>12 Q. So can you describe that -- earlier</p> <p>13 you said based on context is how you determine</p> <p>14 what's on topic.</p> <p>15 So can you walk me through whether you</p> <p>16 think these are on topic, and if so, what the</p> <p>17 context is that makes you believe that they're</p> <p>18 on topic?</p> <p>19 A. So, again, I don't recall the details</p> <p>20 around this employee. But at the time could</p> <p>21 have -- could have -- it -- it com- -- a</p> <p>22 complaint about a university employee could</p> <p>23 have been brought forth about COVID protocols.</p> <p>24 I don't know at this time or I can't recall.</p> <p>25 And so if -- if that was a complaint</p>
<p>118</p> <p>1 that would cause you to conclude that it was</p> <p>2 on topic?</p> <p>3 A. If -- if a -- if an employee was not</p> <p>4 following public health guidance and</p> <p>5 university COVID policy or procedures and, you</p> <p>6 know -- you know...</p> <p>7 Q. Do you have any reason to think that</p> <p>8 that -- that's -- a COVID protocol violation</p> <p>9 was occurring with -- with regards to</p> <p>10 the -- to these -- to these two comments about</p> <p>11 protecting students of color?</p> <p>12 A. I don't know. I don't recall the</p> <p>13 specific instance of the complaint against</p> <p>14 this employee, so I'm not sure. But...</p> <p>15 Q. Okay. There -- to clarify, there is</p> <p>16 no -- it -- do you see the name of an employee</p> <p>17 listed in those comments as we look at them?</p> <p>18 A. No, I do not.</p> <p>19 Q. And with regards to the second</p> <p>20 comment, which says [as read]:</p> <p>21 "Start protecting your</p> <p>22 BIPOC students @UW</p> <p>23 Madison"...</p> <p>24 Would you agree that there's not even</p> <p>25 a reference to any -- any university employees</p>	<p>120</p> <p>1 brought toward -- brought forth about a</p> <p>2 university employee violating COVID protocols,</p> <p>3 that would be on topic given the post was</p> <p>4 about public health guidance about COVID-19.</p> <p>5 Q. If the -- if pivoting to the -- to the</p> <p>6 comment that was moderated and -- and hidden,</p> <p>7 which was close down your primate research</p> <p>8 labs, if there was any primate research going</p> <p>9 on that was relevant to COVID, would that --</p> <p>10 would that make that comment on topic, then,</p> <p>11 under -- under this context?</p> <p>12 MR. KILPATRICK: Objection;</p> <p>13 speculation.</p> <p>14 BY MR. BERRY:</p> <p>15 Q. Answer the question.</p> <p>16 A. I guess if it -- it was relevant, yes.</p> <p>17 Q. Okay. So potentially the -- the close</p> <p>18 down your primate research labs comment was on</p> <p>19 topic, depending on context and other</p> <p>20 information that's not apparent from -- from</p> <p>21 the comment itself that -- that's correct?</p> <p>22 A. There's a potential for it.</p> <p>23 But -- but like the other two comments above</p> <p>24 it, I'd say it would all -- all three would be</p> <p>25 stretches to be considered on topic.</p>

Transcript of Nate Moll
Conducted on March 9, 2022

31 (121 to 124)

<p>121</p> <p>1 Q. Okay. If all three are stretches to 2 be considered on topic, why -- why was one 3 comment hidden but the other two were not? 4 A. There was an account level -- there's 5 an account level restriction placed on -- on 6 the bottom comment for the Madeline Krasno 7 account. 8 There were not account level 9 restrictions placed on the other two comments 10 in question. 11 Q. Have you -- 12 A. But that would have resulted in a 13 manual moderation for the other -- 14 (Indiscernible simultaneous 15 colloquy.) 16 BY MR. BERRY: 17 Q. As you stated earlier, you would have 18 received a comment that the close down your 19 primate research lab comment was made; that's 20 correct? 21 MR. KILPATRICK: Objection; 22 mischaracterizes previous testimony. 23 BY MR. BERRY: 24 Q. Would you have received -- should 25 Instagram have given you a notification when</p>	<p>123</p> <p>1 about whether the university primate research 2 ever relates to COVID-19 research? 3 A. I don't have any personal knowledge, 4 no. 5 Q. And what -- when would -- when would 6 you decide whether to -- you know, to 7 investigate whether something that's 8 potentially on topic is, in fact, on topic 9 versus when you wouldn't make efforts to 10 investigate that background context? 11 A. It's -- it's, I think it's context 12 dependent, but I would also, you know, rely on 13 those resources I -- I spelled out earlier, 14 subject matter expert or KB doc or general 15 institutional knowledge. 16 Q. Okay. So -- so would it be fair to 17 say that's a judgement -- a judgment call that 18 the moderator, such as yourself, would make 19 depending on the context, whether to do 20 additional research or not? 21 A. Yes. 22 Q. Okay. So now we have before us 23 Exhibit 24. Can you -- and this is a post 24 from the university's Facebook account. 25 Can you -- can you just describe</p>
<p>122</p> <p>1 that auto moderated comment was made? 2 A. I believe so, but given that 3 this -- yeah, this post was from 4 November 2020, which was before the inbox 5 updated it's very possible we received a 6 notification, but might not have seen it in 7 the inbox. 8 MR. BERRY: Can we do -- can we move 9 on to another exhibit, then, marked as -- I 10 think this will be marked as Exhibit 24, the 11 file name is UW0245. 12 (Whereupon, Moll Deposition 13 Exhibit No. 24 was marked 14 for identification.) 15 BY MR. BERRY: 16 Q. And while we're -- we're pulling that 17 up, with regards to the last -- to the last 18 exhibit with the auto moderated comment, have 19 you -- have you undergone any -- any effort to 20 research whether the University of Wisconsin's 21 primate research is related to COVID-19 in any 22 way? 23 A. I haven't done any personal research, 24 no. 25 Q. Do you have any personal knowledge</p>	<p>124</p> <p>1 the -- what this post is? 2 A. Yeah. I can't see -- oh, no, it's 3 fine. It's not within the screenshot. 4 I can't see any social copy associated 5 with this post. But generally, this 6 is -- this is promoting an event, the Martin 7 Luther King symposium on Monday, January 25th. 8 Q. And can I have you look at 9 the -- there's a -- some comments there. It 10 looks like there are several comments that 11 appear to have been hidden; is that accurate? 12 Is that what the -- I'm actually color 13 blind. I think that's a -- I think that's a 14 yellow box with grayed-out comments? 15 A. Yes. That's a yellow box, but... 16 Q. And those are all comments that -- 17 that have been moderated; correct? 18 A. Correct. 19 Q. Can you describe what -- can you tell 20 how they were moderated? 21 Was this by -- were they -- were they 22 actively hidden or did they -- were they auto 23 moderated? 24 Do you have any idea being able to 25 tell how they were moderated?</p>

Transcript of Nate Moll
Conducted on March 9, 2022

32 (125 to 128)

<p>125</p> <p>1 A. I can't tell from this screenshot, no.</p> <p>2 Q. Okay. I'd like to direct your</p> <p>3 attention to the second-to-last comment here</p> <p>4 from a Suzie Cook.</p> <p>5 Well -- and actually, before</p> <p>6 we -- yeah, to Suzie Cook.</p> <p>7 And does her comment violate the</p> <p>8 off-topic comment policy or -- let me rephrase</p> <p>9 that. Not using the word "policy."</p> <p>10 Does Suzie Cook's comment qualify as</p> <p>11 on-topic or off-topic?</p> <p>12 A. Well, the interim guidance on -- on or</p> <p>13 off topic was developed in the spring of 2021.</p> <p>14 THE WITNESS: And you -- if you could,</p> <p>15 scroll up, please.</p> <p>16 This was an event -- promoting an</p> <p>17 event on January 25th. So I can't see the</p> <p>18 original date of the post. But I would assume</p> <p>19 that this was an in-person event. So it</p> <p>20 occurred before we shut down for the pandemic.</p> <p>21 So this was January 2021. So this was</p> <p>22 before the interim guidance was provided to</p> <p>23 social media managers.</p> <p>24 BY MR. BERRY:</p> <p>25 Q. Regardless of whether it occurred</p>	<p>127</p> <p>1 (Whereupon, Moll Deposition</p> <p>2 Exhibit No. 25 was marked</p> <p>3 for identification.)</p> <p>4 BY MR. BERRY:</p> <p>5 Q. And are you familiar with this</p> <p>6 document?</p> <p>7 A. Sorry. I -- could you zoom in a</p> <p>8 little bit, please? It's a little blurry.</p> <p>9 Thank you.</p> <p>10 Oh, yes, I am familiar.</p> <p>11 Q. And what is it?</p> <p>12 A. This is a screenshot of a comment</p> <p>13 section from a UW-Madison Instagram post.</p> <p>14 Q. And what's the topic of the post?</p> <p>15 A. Let's see. I believe this was a photo</p> <p>16 from our moments in time series where we</p> <p>17 shared kind of the photographer's choice from</p> <p>18 throughout the past year.</p> <p>19 It's kind of like a year-end recap.</p> <p>20 And this specific post was about a terrier</p> <p>21 receiving a health checkup at Dane County</p> <p>22 Humane Society.</p> <p>23 Q. And all three of those comments were</p> <p>24 moderated. And the first one has a yellow box</p> <p>25 that's been added around it.</p>
<p>126</p> <p>1 before or after the interim guidance,</p> <p>2 what -- what's your view as you -- as you sit</p> <p>3 here today, what is your view about whether</p> <p>4 that comment is on topic or off topic?</p> <p>5 A. I'm sorry. Can you repeat the</p> <p>6 question?</p> <p>7 Q. Yeah. As you sit here today,</p> <p>8 what -- what is your view about whether Suzie</p> <p>9 Cook's comment is on topic or off topic?</p> <p>10 A. As I sit here today, Suzie Cook</p> <p>11 mentioned Martin Luther King. So I would</p> <p>12 consider this comment to be on topic.</p> <p>13 Q. Okay. Were you involved in moderating</p> <p>14 the comment?</p> <p>15 A. I don't recall. I wouldn't even be</p> <p>16 able to lookup -- Facebook doesn't have that</p> <p>17 level of activity log. I don't recall who or</p> <p>18 how this comment was moderated.</p> <p>19 Q. Okay. If we could move on to the --</p> <p>20 to the next exhibit, then?</p> <p>21 MR. BERRY: I'd like to mark it -- I</p> <p>22 think we're on 25. And the file for this</p> <p>23 should be UW0284.</p> <p>24</p> <p>25</p>	<p>128</p> <p>1 My understanding that -- that means it</p> <p>2 was automatically hidden with the auto</p> <p>3 moderator.</p> <p>4 Does that -- does that comport with</p> <p>5 your understanding?</p> <p>6 A. I believe so, yes.</p> <p>7 Q. What -- why would this comment have</p> <p>8 been restricted?</p> <p>9 A. Because it -- it may have contained a</p> <p>10 word or phrase that was in our auto moderator.</p> <p>11 Q. And what's the -- can you just read</p> <p>12 off the full comment that was automatically</p> <p>13 moderated?</p> <p>14 A. Oh [as read]:</p> <p>15 "Stop testing on innocent</p> <p>16 monkeys."</p> <p>17 Q. What -- what word or words in that</p> <p>18 comment may have been filtered by the auto</p> <p>19 moderator?</p> <p>20 A. I'm not sure. I -- I would need to</p> <p>21 see the list at the time that this comment was</p> <p>22 made.</p> <p>23 Q. Okay. And does that comment</p> <p>24 violate -- excuse me. Is that -- is the stop</p> <p>25 testing on innocent monkeys comment on topic</p>

<p>129</p> <p>1 or off topic?</p> <p>2 A. I'd say this was off topic.</p> <p>3 Q. And why is it off topic?</p> <p>4 A. The comment says "stop testing on</p> <p>5 innocent monkeys." The Instagram post is</p> <p>6 about a terrier, I assume a dog, receiving a</p> <p>7 health checkup at the humane society.</p> <p>8 Q. Okay. The last com- -- the last</p> <p>9 sentence of the -- of the university's post on</p> <p>10 this exhibit, says that [as read]:</p> <p>11 "The -- the university's</p> <p>12 program, quote, provides a</p> <p>13 needed resource for</p> <p>14 at-risk animals, and for</p> <p>15 those who care for them</p> <p>16 each day."</p> <p>17 End of quote. Is that -- that's an</p> <p>18 accurate summary?</p> <p>19 A. Yes.</p> <p>20 Q. Would -- would monkeys used in</p> <p>21 research, would you consider them to be</p> <p>22 at-risk animals?</p> <p>23 A. I'm not sure. I believe, like, this</p> <p>24 post is about pets as it's, you know, humane</p> <p>25 society. It's about the humane society, and</p>	<p>131</p> <p>1 of this post or not?</p> <p>2 A. Sorry. Could you repeat the question?</p> <p>3 Q. Yeah. I'm trying to understand</p> <p>4 would -- would this be -- would you consider</p> <p>5 it to be comments about research on monkeys at</p> <p>6 the university to be on topic insofar as</p> <p>7 university employees are -- are caring for the</p> <p>8 monkeys at the university, just as the</p> <p>9 university shelter medicine program employees</p> <p>10 are -- are caring for -- for animals as well?</p> <p>11 A. I still think this post is about</p> <p>12 household pets. So I -- I don't think that</p> <p>13 monkeys would fit into this -- would be -- I</p> <p>14 think that monkeys would be off topic.</p> <p>15 Q. Moving on to the second comment there,</p> <p>16 this has a red box. I understand that means</p> <p>17 it was manually hidden; is that correct?</p> <p>18 A. Correct.</p> <p>19 Q. And this one doesn't refer to monkeys.</p> <p>20 It says [as read]:</p> <p>21 "You all do not care about</p> <p>22 animals. You literally</p> <p>23 have some locked up in</p> <p>24 cages there and testing on</p> <p>25 them. Leave them alone.</p>
<p>130</p> <p>1 that -- a UW veterinary medicine program.</p> <p>2 Q. Did humane societies exclusively deal</p> <p>3 with -- with pets or companion animals or can</p> <p>4 humane societies ever -- ever end up</p> <p>5 sheltering animals that aren't used as pets?</p> <p>6 A. I don't know.</p> <p>7 Q. Did you do any research to find out</p> <p>8 whether the Dane County Humane Society or the</p> <p>9 shelter medicine program at the University of</p> <p>10 Wisconsin ever deal with non- -- non pet or</p> <p>11 non companion animals?</p> <p>12 A. I did not.</p> <p>13 Q. Okay. And at this -- the end of the</p> <p>14 post talks about those who care for them each</p> <p>15 day referring -- referring to the at-risk</p> <p>16 animals; correct?</p> <p>17 A. I believe that refers to the human</p> <p>18 caretakers.</p> <p>19 Q. Okay. So with -- the human caretakers</p> <p>20 at the university's shelter medicine program</p> <p>21 and at the humane society?</p> <p>22 A. Yes.</p> <p>23 Q. So would -- would people -- people</p> <p>24 caring for -- for university employees caring</p> <p>25 for animals, that -- is that within the topic</p>	<p>132</p> <p>1 How would you feel being</p> <p>2 in a cage?"</p> <p>3 Would you read that that post is about</p> <p>4 animals generally, not monkeys specifically?</p> <p>5 A. About animals generally, yes.</p> <p>6 Q. And is that -- is that comment on</p> <p>7 topic or off topic?</p> <p>8 A. Given my interpretation at this moment</p> <p>9 or what?</p> <p>10 Q. Yeah. Just standing here right now,</p> <p>11 do you think that this is on topic or off</p> <p>12 topic?</p> <p>13 A. Standing here right now, I would say</p> <p>14 that this comment is on topic as it talks</p> <p>15 about animals. And we refer to at-risk</p> <p>16 animals -- or animals in -- in the -- the</p> <p>17 caption.</p> <p>18 Q. Was there a time where you would have</p> <p>19 thought this was off topic?</p> <p>20 A. Prior to interim guidance from office</p> <p>21 of legal affairs, yes, I would have thought</p> <p>22 this was off topic.</p> <p>23 Q. And why -- and why is that?</p> <p>24 A. Talking about, like, animal testing</p> <p>25 when the post itself is about a pet receiving</p>

<p>133</p> <p>1 a health checkup at the humane society.</p> <p>2 Q. So at one point you would have</p> <p>3 considered that off topic. But now sitting</p> <p>4 here today you consider that to be on topic?</p> <p>5 A. Correct.</p> <p>6 Q. Okay. Is -- is there -- is there</p> <p>7 anything in -- in that interim guidance</p> <p>8 specifically that that informs this change of</p> <p>9 opinion that you could -- that you can</p> <p>10 identify?</p> <p>11 A. I think generally, the interim</p> <p>12 guidance just helped me better understand the</p> <p>13 definition of off topic and the gray area of</p> <p>14 both on- and off-topic content.</p> <p>15 Q. Were you personally involved in</p> <p>16 moderating both of these hidden comments in</p> <p>17 the red box on this Exhibit 25?</p> <p>18 A. I was the one that took this</p> <p>19 screenshot and -- and marked the boxes. So,</p> <p>20 yes, I was.</p> <p>21 Q. And, okay. Did you -- in -- in making</p> <p>22 the decision to -- to hide the comments on</p> <p>23 Exhibit 25, did you -- did you do any research</p> <p>24 about whether the university's shelter</p> <p>25 medicine program does any animal testing or</p>	<p>135</p> <p>1 journal sentinel online -- or a journal</p> <p>2 sentinel article about Martin Luther King</p> <p>3 Junior speaking to UW-Madison. And you have</p> <p>4 Milwaukee students after winning the Noble</p> <p>5 Prize.</p> <p>6 Q. And moving to the comments made by</p> <p>7 Rosy Tree, the second comment there, that's a</p> <p>8 yellow -- a yellow box suggest- -- indicating</p> <p>9 that it had been automatically moderated; is</p> <p>10 that correct?</p> <p>11 A. The color coding only applied to</p> <p>12 Instagram comments. The boxes around Facebook</p> <p>13 comments are just marking comments that were</p> <p>14 hidden in general.</p> <p>15 Q. Is there -- is there any way to tell</p> <p>16 whether Rosy Tree's comment was hidden -- what</p> <p>17 was moderated manually or automatically?</p> <p>18 A. I can't tell from this post, no.</p> <p>19 Q. Okay.</p> <p>20 A. Or the screenshot.</p> <p>21 Q. Can you -- her -- Rosy Tree's comments</p> <p>22 said [as read]:</p> <p>23 "I don't think Dr. King</p> <p>24 would approve of your lab</p> <p>25 electrocuting innocent</p>
<p>134</p> <p>1 provides any services to animal research</p> <p>2 occurring in the university?</p> <p>3 A. I did not.</p> <p>4 Q. Okay. Did you think to do any kind of</p> <p>5 research like that to determine</p> <p>6 whether -- whether these -- you know,</p> <p>7 potentially on-topic comments were, in fact,</p> <p>8 on topic or not?</p> <p>9 A. At the time, no.</p> <p>10 Q. Okay.</p> <p>11 MR. BERRY: Can we move on to the next</p> <p>12 exhibit. I will mark it 26, file name UW0262</p> <p>13 or -- yeah, 0262, yes.</p> <p>14 (Whereupon, Moll Deposition</p> <p>15 Exhibit No. 26 was marked</p> <p>16 for identification.)</p> <p>17 BY MR. BERRY:</p> <p>18 Q. I believe -- are you pretty familiar</p> <p>19 with this document?</p> <p>20 A. Yes. This is a screenshot of a</p> <p>21 Facebook post -- part of a post in a comment</p> <p>22 section.</p> <p>23 Q. And what -- what is the topic for the</p> <p>24 post that we've marked as Exhibit 26?</p> <p>25 A. A-- this is a partial screenshot of a</p>	<p>136</p> <p>1 monkeys. Please put an</p> <p>2 end to the animal torture</p> <p>3 that is happening at your</p> <p>4 university."</p> <p>5 And then it -- it includes a link to a</p> <p>6 petition, according to the URL.</p> <p>7 Is that an accurate characterization</p> <p>8 of what we see for that comment?</p> <p>9 A. Yes.</p> <p>10 Q. And is their comment on topic or off</p> <p>11 topic?</p> <p>12 A. Well, in terms of on or off topic,</p> <p>13 Rosy Tree mentions Dr. King, which the -- the</p> <p>14 original post is about.</p> <p>15 But I also wanted to point out that</p> <p>16 there are other criteria for which stages in</p> <p>17 the social media statement for which we can</p> <p>18 hide or moderate a comment.</p> <p>19 Q. Okay. Are -- were you -- were</p> <p>20 you -- were you involved in moderating this</p> <p>21 comment?</p> <p>22 A. I don't recall.</p> <p>23 Q. And what -- you mentioned that there</p> <p>24 are other reasons besides being off topic.</p> <p>25 So what reasons -- what other reasons,</p>

<p>137</p> <p>1 if any, do you think would justify hiding this 2 comment? 3 A. Well, I see a link to a petition, 4 which promoting an outside -- I considered it 5 a promotion, and promotions are a -- one of 6 the criteria for an outside organization. 7 Sorry. A petition for an outside 8 organization is one of the grounds for 9 moderating a comment. 10 Q. Is there any indication here that 11 that -- that an organization is behind the 12 petition? 13 A. Well, it's a website top-level domain 14 is onegreenplanet.org. Dot org is usually 15 received for organizations. 16 Q. Other than the dot org URL suffix, is 17 there any other indication that this was 18 promoting an organization through that link? 19 A. Not that I can see. But in this 20 screenshot there is the link to see more. 21 That -- the full comment is not displayed in 22 this screenshot. So there may be other 23 content that Rosy Tree included in this 24 comment that we can't currently see. 25 Q. And there's a --</p>	<p>139</p> <p>1 (Whereupon, Moll Deposition 2 Exhibit No. 28 was marked 3 for identification.) 4 BY MR. BERRY: 5 Q. Okay. Are you familiar with this 6 document? 7 A. Yes, I am. 8 Q. And what is it? 9 A. This is a screenshot of an Instagram 10 comment section on a university -- on a 11 UW-Madison Instagram post. 12 Q. And turning to the comment by 13 Ms. Krasno, the second comment from the top 14 there, does -- does that comment violate 15 the -- excuse me. 16 Is Ms. Krasno's comment on topic or 17 off topic? 18 A. [As read]: 19 "Something innocuous." 20 It's -- I would probably consider it 21 off topic. I don't know. I don't know what 22 it means. 23 Q. Well -- 24 A. But it -- it could be on topic. I 25 don't know. It's one of those kind of gray</p>
<p>138</p> <p>1 MR. BERRY: Can we move on to the next 2 exhibit, which we can mark as 27. This should 3 be file name UW0144. 4 (Whereupon, Moll Deposition 5 Exhibit No. 27 was marked 6 for identification.) 7 BY MR. BERRY: 8 Q. And do you -- are you familiar with 9 this document? 10 A. I am, yes. It's a screenshot of the 11 page settings and for university's Facebook 12 account. And it is a screenshot of the 13 section called "page moderation" where it's 14 the list of words or phrases that the 15 university included to auto moderate Facebook 16 comments. 17 Q. Okay. 18 MR. BERRY: Actually, can we -- I 19 think I have -- I think I had maybe a dyslexic 20 moment here. I meant to say UW0114 not 144. 21 So can we put that exhibit aside and 22 mark the next one as 28, then? 23 And this should be the 114. I'm 24 sorry. 25</p>	<p>140</p> <p>1 areas. 2 Q. And how -- how would you go about 3 this -- deciding that and whether this is on 4 topic or off topic? 5 A. I'd probably consult legal. 6 Q. Did you consult legal on -- on this 7 one? 8 A. I don't believe I did. 9 Q. Okay. And this was -- this -- this 10 post was made on February 24, I believe 2021. 11 A. Correct. 12 Q. Which is after February 11, 2021, when 13 you -- when you took over -- sorry. 14 So -- would -- would -- so would 15 February 24, 2021, would you have been the one 16 responsible for moderating comments, then, or 17 would there have been anyone else moderating 18 with you? 19 A. Me or Mike Klein. 20 Q. And what percentage of the time would 21 it be you versus Mike Klein making a 22 moderation decision on a post like this? 23 A. Percentage of time, I'd probably give 24 it 80 percent, 80, 85. 25 Q. Eighty or 85 percent of the time you</p>

<p>141</p> <p>1 would be the one --</p> <p>2 A. I would -- sorry. Yes, yes.</p> <p>3 Q. Okay.</p> <p>4 A. I didn't mean to talk over you.</p> <p>5 Sorry.</p> <p>6 Q. Oh, no, it's -- I mean, I talked over</p> <p>7 you.</p> <p>8 And now Ms. -- Ms. Krasno had been</p> <p>9 previously moderated due to what you viewed as</p> <p>10 off-topic comments prior to this; correct?</p> <p>11 A. Correct.</p> <p>12 Q. So why -- why wouldn't this comment</p> <p>13 have been moderated as well?</p> <p>14 A. Yeah. So with account-level</p> <p>15 restrictions -- well, I -- for this comment</p> <p>16 specifically, the account-level restriction</p> <p>17 had been removed.</p> <p>18 Q. Okay. And it's a -- in this -- this</p> <p>19 comment does not pertain to primate research;</p> <p>20 is that correct?</p> <p>21 A. I don't believe so, no.</p> <p>22 Q. Okay.</p> <p>23 MR. BERRY: Can we go to -- can we go</p> <p>24 on to Exhibit 29, mark it as Exhibit 29, file</p> <p>25 name UW0115?</p>	<p>143</p> <p>1 about processing the Derek Chauvin trial and</p> <p>2 as it relates to diversity, equity, and</p> <p>3 inclusion on campus.</p> <p>4 Q. Turning to the comment by Ms. Krasno,</p> <p>5 does -- does -- is her comment on topic or off</p> <p>6 topic, the second one on this exhibit?</p> <p>7 A. Yeah, sorry. I need to read it here.</p> <p>8 I'd consider this comment on topic.</p> <p>9 Q. Okay. And was the comment moderated?</p> <p>10 A. I don't believe so. It appears here.</p> <p>11 Q. Okay. And what -- and why is it on</p> <p>12 topic? Why do you think it's on topic?</p> <p>13 A. It states this is a very important</p> <p>14 post. We are currently talking about racial</p> <p>15 injustice and systemic oppression. And</p> <p>16 this -- the Instagram post is essentially</p> <p>17 about racial and -- in the -- in the caption</p> <p>18 there we talk about, you know, racial justice.</p> <p>19 Q. Okay. Would you have been -- were you</p> <p>20 involved in moderating a comment or not -- or</p> <p>21 deciding whether to moderate or not moderate</p> <p>22 it?</p> <p>23 A. This is -- yeah, this is after, what,</p> <p>24 end of February, so, yes, yeah.</p> <p>25 Q. And can -- can you explain how you</p>
<p>142</p> <p>1 (Whereupon, Moll Deposition</p> <p>2 Exhibit No. 29 was marked</p> <p>3 for identification.)</p> <p>4 MR. BERRY: And, sorry, this for the</p> <p>5 reporter. This is -- this is 29; right? I</p> <p>6 just want to make sure I have it properly...</p> <p>7 STENOGRAPHER: Yes.</p> <p>8 MR. BERRY: Twenty-nine, okay.</p> <p>9 BY MR. BERRY:</p> <p>10 Q. Are you familiar with the document</p> <p>11 marked as 29, Mr. Moll?</p> <p>12 A. Yes.</p> <p>13 Q. And -- and can you describe what</p> <p>14 this -- what this exhibit is?</p> <p>15 A. This is a screenshot of an Instagram</p> <p>16 comment section on UW-Madison post, Instagram</p> <p>17 post.</p> <p>18 Q. And what's the topic of the post?</p> <p>19 A. This is a message from a chancellor</p> <p>20 addressing the Derek Chauvin -- oh, yeah,</p> <p>21 Derek Chauvin, and -- and George -- so as</p> <p>22 associated, George Floyd on the Black Lives</p> <p>23 Matter movement.</p> <p>24 But this post specifically is a</p> <p>25 message from the chancellor, kind of talking</p>	<p>144</p> <p>1 determined that the comment did not need to</p> <p>2 be -- actually, we can scratch that.</p> <p>3 Would you have thought that that</p> <p>4 comment was on topic at the time it was made?</p> <p>5 A. Yeah, I believe so. Because we</p> <p>6 received the interim guidance on on- or</p> <p>7 off-topic comments in the spring of 2021.</p> <p>8 Q. Okay.</p> <p>9 MR. BERRY: Can we -- I'd like to move</p> <p>10 on. Mark as Exhibit 30 the file named</p> <p>11 "capture April 19, 2021," Instagram post.</p> <p>12 (Whereupon, Moll Deposition</p> <p>13 Exhibit No. 30 was marked</p> <p>14 for identification.)</p> <p>15 BY MR. BERRY:</p> <p>16 Q. And this is how -- this is a post as</p> <p>17 it appeared two days ago as we sit here. And</p> <p>18 it's a screenshot of the -- of the same -- as</p> <p>19 the same post.</p> <p>20 Would you agree that the -- that</p> <p>21 the -- that the post itself is the same</p> <p>22 between Exhibit 29 and Exhibit 30?</p> <p>23 A. This -- this is the same Instagram</p> <p>24 post, yes. The April 19, 2021, yeah.</p> <p>25 Q. Yes. And the "45W" underneath the</p>

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<p>145</p> <p>1 comments, what would the "45W" indicate?</p> <p>2 A. That the comment was made 45 weeks</p> <p>3 ago.</p> <p>4 Q. Forty-five weeks from the -- the date</p> <p>5 of the screenshot; correct?</p> <p>6 A. Sorry, yes. The date of the</p> <p>7 screenshot.</p> <p>8 Q. Okay. There are a few -- there are a</p> <p>9 few comments there relating to racial and</p> <p>10 animal justice.</p> <p>11 Do you -- do you see those comments?</p> <p>12 A. Well...</p> <p>13 Q. For example, one comment -- I'll be</p> <p>14 more specific. One comment says -- about</p> <p>15 racial justice and then animal justice. Do</p> <p>16 you see that comment?</p> <p>17 A. Yes, I do.</p> <p>18 Q. And then there's a comment just above</p> <p>19 that, it says [as read]:</p> <p>20 "Best to go learn something</p> <p>21 about racial justice and</p> <p>22 animal welfare. Just an</p> <p>23 idea."</p> <p>24 Do you see that comment as well?</p> <p>25 A. I do.</p>	<p>147</p> <p>1 I would consider both of those off</p> <p>2 topic.</p> <p>3 Q. What about the -- the comment that's</p> <p>4 an eye roll emoji, is that -- is that comment</p> <p>5 on topic or off topic?</p> <p>6 A. I'm not sure.</p> <p>7 Q. If you were -- if you were -- if you</p> <p>8 were moderating this today, let's say that</p> <p>9 comment was posted today and you were making a</p> <p>10 decision whether to moderate it or not, what</p> <p>11 would you decide to do?</p> <p>12 A. I'd probably contact legal.</p> <p>13 Q. How often do you contact legal to</p> <p>14 help -- to guide whether to make a moderation</p> <p>15 decision with regards to a comment?</p> <p>16 A. Yeah. So I would -- I would</p> <p>17 say -- well, it -- it's a case-by-case basis.</p> <p>18 I don't have a set, you know, meeting or, you</p> <p>19 know, a -- I don't have a set calendar</p> <p>20 appointment to talk to legal about any given</p> <p>21 topic. So I just reach out as needed.</p> <p>22 Q. If you -- if you had to guess, what</p> <p>23 would the frequency be, once a day, once a</p> <p>24 week, once a month, once a year?</p> <p>25 Is there a frequency with which you</p>
<p>146</p> <p>1 Q. Are these -- are those comments on</p> <p>2 topic or off topic?</p> <p>3 A. They mention racial justice. So I</p> <p>4 would consider them on topic.</p> <p>5 Q. Okay. And -- okay. There were a</p> <p>6 couple other comments. There's a comment that</p> <p>7 is just -- that's an eye roll, and then also a</p> <p>8 comment that says "Cornelias" with exclamation</p> <p>9 points.</p> <p>10 Do you see those comments on this</p> <p>11 Exhibit 30?</p> <p>12 A. Yes, I do. Near the bottom?</p> <p>13 Q. Yes.</p> <p>14 A. Yeah.</p> <p>15 Q. Are those topics on topic or off</p> <p>16 topic?</p> <p>17 A. Those comments -- well, I would</p> <p>18 consider the comment "release Cornelias" --</p> <p>19 there are two there at the bottom [as read]:</p> <p>20 "Release Cornelias. It's</p> <p>21 been ten long years. How</p> <p>22 many more decades?"</p> <p>23 And then the very bottom comment [as</p> <p>24 read]:</p> <p>25 "Release Cornelias."</p>	<p>148</p> <p>1 reach out to legal about questions relating to</p> <p>2 moderation?</p> <p>3 MR. KILPATRICK: Objection; calls for</p> <p>4 speculation.</p> <p>5 BY MR. BERRY:</p> <p>6 Q. Answer the question.</p> <p>7 A. I -- I really -- I really don't know.</p> <p>8 It's -- it's on a -- you know, a case-by-case</p> <p>9 basis. And it -- it's only dependent on what</p> <p>10 types of comments we receive. I can't predict</p> <p>11 what types of comments we'll receive.</p> <p>12 Q. Okay. Earlier we -- in the -- in the</p> <p>13 social media statement and the interim</p> <p>14 guidelines -- guideline, we -- we -- you</p> <p>15 acknowledged previously in this deposition</p> <p>16 that -- that you may remove comments for being</p> <p>17 off topic, but that you're not required to; is</p> <p>18 that correct?</p> <p>19 A. Correct.</p> <p>20 Q. And -- and so in a situa- -- with</p> <p>21 regards to the eye rolling emoji, what -- why</p> <p>22 would you take the time to contact legal about</p> <p>23 a moderation decision when you're not required</p> <p>24 to moderate it at all?</p> <p>25 A. Because I was asked the question about</p>

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Conducted on March 9, 2022

38 (149 to 152)

<p>149</p> <p>1 it.</p> <p>2 Q. And you -- and your response is that</p> <p>3 you would contact legal in -- in deciding</p> <p>4 whether to -- whether to leave it or whether</p> <p>5 to moderate it; correct?</p> <p>6 A. Correct. Comments with strictly</p> <p>7 emojis or one emoji, yeah, those are tough. I</p> <p>8 don't know.</p> <p>9 Q. Without -- you don't have</p> <p>10 to -- without saying what legal told you, have</p> <p>11 you ever reached out to legal about a single</p> <p>12 emoji comment in the past?</p> <p>13 A. Not that I can recall.</p> <p>14 Q. Okay. We can move on.</p> <p>15 MR. BERRY: Would you be okay with</p> <p>16 taking a ten-minute break right now, and then</p> <p>17 make we just get back and --</p> <p>18 (Indiscernible simultaneous</p> <p>19 colloquy.)</p> <p>20 MR. KILPATRICK: 3:10?</p> <p>21 MR. BERRY: Is that okay?</p> <p>22 MR. KILPATRICK: Yeah. 3:10?</p> <p>23 MR. BERRY: 3:10.</p> <p>24 MR. KILPATRICK: Okay. Good.</p> <p>25 VIDEOGRAPHER: Then we're going off</p>	<p>151</p> <p>1 Q. And what's the topic of the post?</p> <p>2 A. I need to, quick, read it here.</p> <p>3 Q. Take your time.</p> <p>4 A. Generally speaking, this is a news</p> <p>5 story about the COVID -- or the virus that</p> <p>6 causes COVID-19, and research performed on</p> <p>7 campus to determine when pneumonia is caused</p> <p>8 by the COVID-19 disease.</p> <p>9 Q. Okay. And turning -- if we could</p> <p>10 scroll down just a little bit, there's</p> <p>11 a -- looks like a hidden -- a hidden comment</p> <p>12 from a Warren Knapp.</p> <p>13 Do you agree that's -- that's a hidden</p> <p>14 comment?</p> <p>15 A. That is a hidden comment, yeah.</p> <p>16 Q. And it states that [as read]:</p> <p>17 "Did you figure that out by</p> <p>18 using abused monkeys?"</p> <p>19 Is that accurate representation of the</p> <p>20 comment that was hidden?</p> <p>21 A. Yes, it is.</p> <p>22 Q. And how was the comment moderated?</p> <p>23 A. I'm not sure. Either manually or</p> <p>24 automatically, but I can't tell from the</p> <p>25 screenshot.</p>
<p>150</p> <p>1 the record. The time is 3:01.</p> <p>2 (A short recess was had.)</p> <p>3 VIDEOGRAPHER: The time is 3:16.</p> <p>4 We're on the record at the start of recording</p> <p>5 4.</p> <p>6 BY MR. BERRY:</p> <p>7 Q. All right. Welcome back. Let's -- I</p> <p>8 want to go through a few more posts here right</p> <p>9 now.</p> <p>10 MR. BERRY: What -- what exhibit are</p> <p>11 we on right now?</p> <p>12 TECHNICIAN: The next exhibit will be</p> <p>13 Exhibit 31.</p> <p>14 MR. BERRY: So can we do file UW0358,</p> <p>15 and mark that as Exhibit 31?</p> <p>16 (Whereupon, Moll Deposition</p> <p>17 Exhibit No. 31 was marked</p> <p>18 for identification.)</p> <p>19 BY MR. BERRY:</p> <p>20 Q. For Exhibit 31, can -- are you</p> <p>21 familiar with this -- with this document?</p> <p>22 A. Yes, I am.</p> <p>23 Q. And what is it?</p> <p>24 A. This is a screenshot of a U of Madison</p> <p>25 Facebook post.</p>	<p>152</p> <p>1 Q. And if it was automatically moderated,</p> <p>2 that would have been through use of forbidden</p> <p>3 word or phrase; correct?</p> <p>4 A. Another word or phrase that was added</p> <p>5 to the auto moderation list on Facebook.</p> <p>6 Q. Okay. Where -- were you -- were you</p> <p>7 involved in moderating the comment?</p> <p>8 A. I don't know. I don't recall.</p> <p>9 Q. And the -- do you -- do you think that</p> <p>10 the comment is on topic or off topic?</p> <p>11 A. This one's hard to say. Yeah.</p> <p>12 This -- this is a gray area. I'm not sure.</p> <p>13 Q. Is there -- any reason why -- well,</p> <p>14 would it be possible in your role as a social</p> <p>15 media manager to provide a response to the</p> <p>16 question?</p> <p>17 A. It would be possible, yes.</p> <p>18 Q. And what would -- what would factor in</p> <p>19 your decision to -- to keep it hidden or to</p> <p>20 hide it rather than providing an answer to the</p> <p>21 question?</p> <p>22 A. I mean, there are a number of factors.</p> <p>23 This comment specifically depends on, you</p> <p>24 know, what time of day, and just the</p> <p>25 circumstance in which, you know, we saw the</p>

<p>153</p> <p>1 comment, and whether or not a subject matter 2 expert was available to answer questions about 3 it, or if-- or if the question is even 4 answerable. Those are the first few that come 5 to mind. 6 MR. BERRY: Moving on, can we pull up 7 files UW0274 and mark that as Exhibit 32? 8 (Whereupon, Moll Deposition 9 Exhibit No. 32 was marked 10 for identification.) 11 BY MR. BERRY: 12 Q. For this Exhibit 32, Mr. Moll, are you 13 familiar with this document? 14 A. Are you able to scroll up? 15 Oh, yes. I mean, I -- I took the 16 screenshot. So I'm familiar with it. 17 Q. And in the -- and can you describe 18 what the document is? 19 A. This is a screenshot of a UW Facebook 20 comment section. 21 Q. And what's the topic of the post? 22 A. That's where I was asking to scroll 23 up, but we just got the tail end, kind of the 24 headline. The headline states [as read]: 25 "UW startup data chat</p>	<p>155</p> <p>1 grounds for hiding the comment. 2 Q. Okay. And can I have you look at the 3 very -- the top comment on -- on this exhibit, 4 it says [as read]: 5 "Are you aware that Bascom 6 Hall was shown on Young 7 Sheldon last night? So 8 cool." 9 Do you see that comment? 10 A. I do so that comment. 11 Q. Was -- is that comment on topic or off 12 topic? 13 A. Just by reading the headline 14 the -- about data chat, I don't believe this 15 comment would be on topic. 16 Q. There -- who would have been involved 17 in the decision whether to -- whether to 18 moderate the Young Sheldon comment? 19 A. I'm not sure when this Facebook post 20 was made. So it -- it could have been anybody 21 on the social media team in the university 22 communications. 23 Q. Do you -- do you think that that 24 comment should have been hidden with regards 25 to the Young Sheldon show?</p>
<p>154</p> <p>1 democratizes data 2 science." 3 Q. And the -- there's a couple comments 4 that -- that are hidden. Would you agree with 5 that? 6 A. Yes. 7 Q. And one of the comments by Raven 8 Flores is hidden. Can you -- can you describe 9 what -- whether that comment is on topic or 10 off topic? 11 A. This is -- the comment was -- they 12 just either typed in manually or pasted in a 13 URL to a WRT radio station website. 14 And the headline is about an animal 15 rights group suing UW-Madison for allegedly 16 hiding critical comments on social media. 17 Q. Is that -- is that comment -- well, 18 first question: Is that comment on topic or 19 off topic? 20 A. I would consider this off topic. 21 Q. And would -- would there be any other 22 reason to moderate this comment, besides being 23 off topic? 24 A. By looking at it here, I -- I think 25 that justify it being off topic would be</p>	<p>156</p> <p>1 A. It is -- well, based on what I can see 2 in the screenshot, I believe that it is off 3 topic. So it -- it could be hidden or 4 moderated. 5 Q. So why -- why would the -- why would 6 the comment about the animal rights group 7 suing the university for hiding comments, why 8 would that be moderated, but the comments 9 about Young Sheldon would not be moderated? 10 A. I'm -- I'm not sure. It just depends 11 on -- on the -- the social media lead at that 12 time, how closely they were monitoring 13 comments or, yeah, if -- yeah. I'm not sure. 14 Q. Okay. If we can -- 15 MR. BERRY: We can take the exhibit 16 down. 17 BY MR. BERRY: 18 Q. We've been talking quite a bit 19 about -- about decisions -- about whether to 20 moderate or not moderate particular comments 21 on posts. 22 I want to -- I want to pivot just for 23 a moment up to -- to account level 24 restrictions. 25 How do you decide whether</p>

<p>157</p> <p>1 to -- whether to restrict an entire account on 2 the university's Facebook or Instagram social 3 media versus simply moderating comments that 4 they make? 5 A. Sure. Well, we need a -- I want to 6 draw a line of distinction that re- -- like an 7 account-level restriction on Instagram is 8 different than an account level restriction on 9 Facebook, so far as that there is a specific 10 tool on Instagram called restrict that does 11 not exist on Facebook. So I just -- I just 12 want to make that -- that clear. 13 Q. And what -- other than restriction, 14 other than -- excuse me. Other than an 15 account restriction, what other kind of 16 account level moderation actions can be taken, 17 if any? 18 A. Facebook and Instagram both give you 19 the -- the option to block or ban a user from 20 a page or from -- from an account. 21 Q. What does it mean? 22 A. That's the only other account level 23 restriction you can place. 24 Q. Is that -- is blocking and banning, 25 are those the same -- are those synonymous</p>	<p>159</p> <p>1 appear as if they're impersonating Facebook. 2 I think one is called, like page disable. I 3 don't recall the name of the other account. 4 But in both instances, they -- these 5 accounts will send the UW-Madison Facebook 6 page a direct message where it's threatening 7 to disable the account or -- or you have a 8 copyright infringement claim or something of, 9 you know, that nature where it's -- the 10 message states something to the effect of, 11 like if you don't take action on this, your 12 account will be -- or your page will be 13 disabled or taken down or -- you know, and 14 then they provide a link to click where you 15 can take action to not have your page taken 16 down. But those accounts are fake. You know, 17 it's not represented by Facebook. 18 And so it's -- I would call it like a 19 scam or phishing attempt. And so to protect 20 our account and, you know, other social media 21 staff that might see that comment -- or that 22 that -- that direct message to, you know, 23 protect our account, I -- you know, decided 24 that this -- this is a nefarious, malicious 25 account looking to, you know, take over our</p>
<p>158</p> <p>1 actions, or do they mean two different things? 2 A. I think those are synonymous. 3 Q. Is -- does the university block people 4 from its social media accounts? 5 A. No. Not an account level block or -- 6 or ban. I -- yeah. 7 Q. So at -- when the university takes an 8 account level action against somebody, it's 9 only -- it's only to restrict the account, but 10 not to fully block it? 11 A. On Instagram, yes. 12 Q. And not on -- is that true for 13 Facebook as well that that -- accounts are not 14 blocked? 15 A. There are several instances of -- they 16 are Facebook accounts, but they're not tied 17 to, like a person that we -- I -- we have 18 blocked in the past. 19 Q. And what reason have you blocked 20 people on Facebook in the past? 21 A. Sure. So -- 22 Q. Blocked accounts on Facebook. 23 A. Thank you, yeah. 24 So the -- the nature of these -- I can 25 recall two accounts. They are both trying to</p>	<p>160</p> <p>1 page or whatever. So I blocked those accounts 2 for the protection of our Facebook page. 3 Q. Have you ever blocked or banned an 4 account for -- for making repeated off-topic 5 comments? 6 A. Block or ban, no. 7 Q. Okay. 8 A. On -- on Facebook, no. Sorry, just to 9 make sure -- 10 Q. Have you ever blocked or banned on 11 Instagram? 12 A. Blocked or banned, no. 13 Q. And on Instagram, have you -- have you 14 restricted an account for -- for making 15 off-topic comments? 16 A. Yes. 17 Q. Okay. Just pin that for a second. 18 Are -- how are political comments 19 treated with regards to social media 20 moderation on the university social media 21 pages? 22 A. Yeah. Political comments are 23 complicated. You know, we do post a lot -- or 24 we do post frequently about elections and, you 25 know, registering to vote and the democratic</p>

<p>1 process. You know, we're considering our 2 demographic of, you know, sometimes first-time 3 voters as -- as university students, we take 4 the role of educating our audience in -- in 5 the steps to register, to find your polling 6 place. You know, all the aspects to -- all 7 the aspects involved in the voting process, 8 but not who to vote for. That's where we draw 9 a very strict line. 10 And in terms of comment moderation, 11 that's where I also draw a strict line to not 12 allow -- or not host any conversations about 13 specific candidates. 14 You know, folks are welcome to talk 15 about the democratic process and -- and 16 voting, but cannot campaign for a specific 17 candidate. And so, yeah, that's where I draw 18 the line, is -- is at specific candidates, you 19 know, where -- where applicable. 20 MR. BERRY: Can -- can we mark UW0520 21 as an exhibit and pull that up? 22 (Whereupon, Moll Deposition 23 Exhibit No. 33 was marked 24 for identification.) 25</p>	<p>161 1 or fit into several other criteria listed in 2 the social media statement. 3 Q. Okay. And you -- you also -- you 4 mentioned having to call Mike and Meredith to 5 talk about handling -- handling potentially 6 harmful comments. I was wondering if you 7 can -- what was the -- what was the result of 8 your discussion with them? 9 A. You know, I -- I don't recall that 10 specific conversation. Or, yeah, I don't -- I 11 don't recall the specific conversation or the 12 result of it. 13 Q. At the -- a person that you're having 14 a conversation with had suggested going back 15 up to the first page here, at the bottom of 16 the first page, that "not sure what to do with 17 the women are the real victims comments." 18 And then curious, if you could -- if 19 you could explain how -- if you could, just 20 explain how that -- how that's harmful under 21 this discussion. 22 A. Sorry. I just need a quick read over 23 this thread to get more context here. 24 Q. Go ahead. Take your time. 25 A. Okay. And could you repeat your</p>
<p>162 1 BY MR. BERRY: 2 Q. Do you see that? 3 A. I see that, yes. 4 Q. Can you describe what Exhibit 33 -- 5 A. This appears to be a screenshot of a 6 Microsoft Teams chat thread. 7 Q. Okay. And so at the bottom you -- you 8 mentioned harmful comments. So your last -- 9 your last message in this thread talk about 10 the merits of hiding harmful comments. 11 Do you see that? 12 A. I see it, yes. 13 Q. What -- what makes a comment harmful? 14 A. As like, I believe in my mindset. 15 Here, a harmful comment would be stating 16 something that could bring harm to someone or 17 a group of people, whether physically, 18 emotionally, mentally or other form of harm. 19 Q. Okay. And what's your view about 20 whether harmful comments can be moderated? 21 A. Well, I feel like it fits the -- into 22 the criteria in our social media statement 23 in -- in several categories based on the 24 content of the -- the comment in question. 25 It could be threatening or injurious</p>	<p>163 1 question, please? 2 Q. Yeah. So the -- the person you're 3 talking with mentions -- says "not sure what 4 to do with the women are real victims 5 comments." And then it goes on to say "I'm 6 inclined to hide as harmful." 7 Can you -- can you explain 8 what -- whether those "women are the real 9 victims comments-" are harmful? 10 A. I am not sure which specific comments 11 that this person is referring to. You know, 12 I -- it looks like they're probably 13 summarizing. And, you know, they were 14 bringing a concern to me about, you know, the 15 nature of these comments, that they deemed to 16 be harmful, but -- you know, as it related to 17 people of color and Asian Americans. And so I 18 thought that I would take that concern to my 19 supervisor. 20 Q. Do you remember if those comments were 21 ultimately -- any of those comments were 22 ultimately moderated or not as a result of 23 that discussion? 24 A. I -- I don't recall. 25 Q. Okay. I want to --</p>

<p>165</p> <p>1 MR. BERRY: Can we pull up UW0449 and</p> <p>2 mark it as a new exhibit? Sorry. I think</p> <p>3 it's 0449. I may have misstated that.</p> <p>4 TECHNICIAN: 0449?</p> <p>5 MR. BERRY: Yeah, that's right.</p> <p>6 TECHNICIAN: Thank you, sir.</p> <p>7 (Whereupon, Moll Deposition</p> <p>8 Exhibit No. 34 was marked</p> <p>9 for identification.)</p> <p>10 BY MR. BERRY:</p> <p>11 Q. Are you familiar with this document</p> <p>12 marked as Exhibit 34?</p> <p>13 A. Yes.</p> <p>14 Q. And what is Exhibit 34?</p> <p>15 A. This is a screenshot of a Microsoft</p> <p>16 Teams chat in the -- the message thread used</p> <p>17 by the social media managing staff.</p> <p>18 Q. Okay. At the very -- on the last</p> <p>19 message it says [as read]:</p> <p>20 "I'm social media lead</p> <p>21 today. Plan includes"...</p> <p>22 And then the third bullet point there</p> <p>23 is [as read]:</p> <p>24 "Monitor antianimal</p> <p>25 research comments. Big</p>	<p>167</p> <p>1 university relations social media guidelines.</p> <p>2 Q. And do you -- and what's your</p> <p>3 understanding of what it -- what that means?</p> <p>4 A. Yeah. I -- I described it previously.</p> <p>5 But at -- generally speaking, it's where we'll</p> <p>6 receive, you know, a wave of comments that are</p> <p>7 typically encouraged or -- or directed</p> <p>8 by -- by a campaign or a viral news story or</p> <p>9 any -- you know, any media that's trying to,</p> <p>10 you know, encourage others to go and -- and</p> <p>11 comment.</p> <p>12 And -- and typically, these -- these</p> <p>13 spam comments are very similar in nature.</p> <p>14 They'll either take, you know, the words</p> <p>15 verbatim or use other very -- sometimes very</p> <p>16 colorful and sometimes threatening language.</p> <p>17 Q. And the -- and this -- this -- your --</p> <p>18 this understanding of what spam is, is</p> <p>19 that -- is that based on your -- your</p> <p>20 experience or is this based on a definition</p> <p>21 that you've consulted somewhere?</p> <p>22 A. This is based on my experience.</p> <p>23 Q. Okay. Going back to this social media</p> <p>24 plan, including to -- to, quote, monitor</p> <p>25 antianimal research comments, wha- -- can</p>
<p>166</p> <p>1 thanks to Nate for</p> <p>2 covering this this</p> <p>3 morning."</p> <p>4 Do you see that, that comment?</p> <p>5 A. Yes.</p> <p>6 Q. And what -- how -- can you explain to</p> <p>7 me what it means to monitor antianimal</p> <p>8 research comments?</p> <p>9 A. Yeah. So in relation to this</p> <p>10 conversation and what I had just previously</p> <p>11 said, 50-plus PETA comments on our Instagram</p> <p>12 posts, this would be considered a -- a -- like</p> <p>13 a spam campaign. These -- and so usually</p> <p>14 we'll see just waves of comments coming in</p> <p>15 that are almost always off topic to the -- the</p> <p>16 post or posts in which users are commenting.</p> <p>17 And so it's just monitoring the</p> <p>18 situation and seeing where potentially</p> <p>19 this -- this campaign is coming from.</p> <p>20 Q. Okay. Is -- you used the word "spam"</p> <p>21 in your response previously. Is -- is "spam"</p> <p>22 a term that's defined by any university</p> <p>23 documents or -- or guidelines that you've</p> <p>24 obtained?</p> <p>25 A. I believe spam is mentioned in the</p>	<p>168</p> <p>1 you -- what makes something an antianimal</p> <p>2 research comment?</p> <p>3 A. A -- I think that in -- with the</p> <p>4 nature of many of these types of comments we</p> <p>5 receive, you know, a spam comment is not</p> <p>6 always an antianimal research comment. I want</p> <p>7 to make that clear.</p> <p>8 What makes an antianimal research</p> <p>9 comment that is, typically speaking, a comment</p> <p>10 that will say something like, stop animal</p> <p>11 testing, or shut down your lab. And, you</p> <p>12 know, it -- it can also be, rot in hell you</p> <p>13 bastards, you know, I wish cancer upon your</p> <p>14 unborn children. Yeah. They can be very</p> <p>15 simple or very threatening.</p> <p>16 Q. In your view, would a -- would a</p> <p>17 comment promoting -- asking to promote more</p> <p>18 cruel animal research, would that be</p> <p>19 antianimal research?</p> <p>20 A. Sorry. Could you restate that?</p> <p>21 Q. Mm-hmm. Would a -- would a comment</p> <p>22 advocating for -- in favor of -- of cruelty</p> <p>23 and animal research, would that be -- would</p> <p>24 you consider that an antianimal research</p> <p>25 comment or -- or other?</p>

<p>169</p> <p>1 A. I guess -- I guess that would be -- I 2 guess that would be diff- -- I guess that 3 would be different. I don't -- I don't think 4 we ever received a comment like that before. 5 But by, you know, we're dealing with 6 negatives and -- or maybe double negatives 7 here. It's hard to interpret. 8 Q. But do -- do you have any personal 9 views about animal research? 10 A. Honestly, not really. I -- you know, 11 given my -- my -- you know, role at the 12 university, I -- I read, you know, a lot of 13 new stories, some of which involve animal 14 research as -- as part of a, you know, 15 particular research study. 16 But I -- I don't hold any particular 17 opinions about it myself. 18 Q. Have you ever read anything about the 19 university that's critical of animal research? 20 A. Have I read anything that's -- sorry. 21 Could you restate the question? 22 Q. You said you -- you read stories 23 relating to the university and animal research 24 that -- that occurs there; is that -- is that 25 correct?</p>	<p>171</p> <p>1 A. Yes, I do. 2 Q. And what is this document? 3 A. This is a screenshot of a Microsoft 4 Teams chat with the social media -- the 5 university communications social media 6 managers. 7 Q. Okay. And do you see at the bottom of 8 your top comment there it says [as read]: 9 "Monitoring animal rights." 10 Is that accurate? 11 A. Yes, I do. 12 Q. How do you -- how do you monitor 13 animal rights? 14 A. This might have been just shorthand, 15 similar to, you know, monitoring antianimal 16 research comments in the past that we referred 17 to in a previous exhibit. 18 Q. Okay. How do you feel about other 19 social justice issues? 20 Putting animal rights aside, how do 21 you feel about social justice issues in 22 general, personally? 23 A. I think -- I mean, I -- I'm passionate 24 about racial justice and inequities. I, you 25 know, am a firm believer in the -- the</p>
<p>170</p> <p>1 A. That is correct in the sense that it's 2 part of a research study. 3 Q. Right. And research study that is 4 occurring at the university? 5 A. Correct. 6 Q. This says -- okay. You can just drop 7 that question entirely, actually. 8 What about your view about -- not just 9 animal research specifically, but do you have 10 an opinion about animal rights in general? 11 A. I -- I really don't. Sorry. I'm just 12 not a very opinionated person. 13 MR. BERRY: Can I -- can we mark as 14 Exhibit 35, UW0701? 15 (Whereupon, Moll Deposition 16 Exhibit No. 35 was marked 17 for identification.) 18 TECHNICIAN: I apologize, Counsel. 19 Would you mind repeating that number? 20 MR. BERRY: UW0701. 21 TECHNICIAN: Thank you, sir. I just 22 misheard. My apologies. 23 BY MR. BERRY: 24 Q. And do you recognize this document 25 marked as Exhibit 35?</p>	<p>172</p> <p>1 environmental impacts that fossil fuels have 2 on -- on our planet, and just, you know, being 3 eco-friendly. 4 I care a lot about LGBTQ plus rights. 5 Those are some of the areas that I -- I 6 personally care about. 7 Q. How do you feel about the 8 environmental impact from -- from animal 9 agriculture, for example? 10 A. I don't have a strong opinion about 11 that specific issue. I just, you know, as 12 I -- you know, the -- the areas I stated 13 before are, you know, very broad topics. 14 I've seen how agriculture runoff can 15 affect the phosphorus levels in the lakes in 16 Madison that -- you know, I -- I see the 17 negative effects. I don't know the full story 18 or, you know, the full impact of it. But I 19 have seen how it has a negative effect on, you 20 know, a lake in my backyard. 21 Q. Okay. So it's -- just to make sure I 22 understand, then, you -- you're passionate 23 about environmental issues insofar as 24 it's -- there's pollution caused by fossil 25 fuels, and also animal agriculture runoff that</p>

<p>1 affects your -- your backyard? 2 A. Well, not just my back -- well, that's 3 an example. I'm particularly interested in 4 alternative energy, so like, solar and wind. 5 Q. And why is that? 6 A. I -- so I was -- I had -- one of my 7 majors was environmental studies in my 8 undergrad at UW-Madison. And I guess that's 9 just -- you know, in -- there's a, you know, 10 wide breadth of courses you can take. And 11 just the particular path I took just -- yeah, 12 I saw, you know, the -- the benefits of, you 13 know, weaning off of fossil fuels and turning 14 more towards our alternative fossil fuels, 15 like solar and wind and -- and other, you 16 know, renewable resources. 17 VIDEOGRAPHER: I'm sorry to interject. 18 I seem to be having some problem with my 19 connection. I wonder if we could go off the 20 record for a moment. If I could restart my 21 router, I think it will fix it. I never had 22 this issue before, but it's skipping on and 23 off now. 24 MR. BERRY: That's totally fine with 25 me.</p>	<p>173 1 subconscious level that your -- that your 2 personal political views could have a -- some 3 impact on the moderation decision that you 4 make? 5 MR. KILPATRICK: Objection; 6 speculative. 7 BY MR. BERRY: 8 Q. You can answer the question. 9 A. It's -- it's possible. You know, but 10 I -- I try to -- as I mentioned, I try to 11 be -- I try to remove, you know, personal 12 beliefs and biases when functioning in my 13 official role. 14 Q. Okay. Moving on, we -- we talked 15 about account restrictions previously. And 16 the university restricted Ms. Krasno's 17 Instagram account from September 2020 through 18 January 2021; is that correct? 19 A. I believe so, yes. 20 Q. And were you involved in the decision 21 to restrict Ms. Krasno's Instagram account? 22 A. I very likely was the one that 23 performed the restriction, yes. 24 Q. And -- and why did you restrict 25 Ms. Krasno's Instagram account?</p>
<p>174 1 VIDEOGRAPHER: Okay. I'll just bring 2 us off for a moment. 3 The time is 4:00 o'clock. It's the 4 end of recording 4. 5 (A short recess was had.) 6 VIDEOGRAPHER: Okay. The time is 7 4:08. We're on the record continuing 8 recording 4. 9 BY MR. BERRY: 10 Q. Did -- I want to wrap up a 11 conversation we were having before the break. 12 Would -- would it be fair to 13 characterize your testimony as you caring 14 about issues like racial equity and the 15 environment, but not having a strong opinion 16 on animal rights? 17 A. That's correct. 18 Q. And -- and does that -- do you think 19 that your -- that your view about -- about the 20 importance of those issues affects your 21 moderation on those social media pages? 22 A. Not personally. I -- at all possible, 23 I try to remove personal, you know, opinions 24 or biases in my official role. 25 Q. Is it -- is it possible that even on a</p>	<p>175 1 A. I had noticed a pattern of -- a 2 consistent pattern of off-topic comments. And 3 so for that reason, and I -- I used a tool 4 that Instagram came out with, I don't think 5 not even a year prior, and they were -- where 6 they -- they announced a tool where you can 7 use this feature called restrict to approve 8 comments on a comment-by-comment basis. 9 Q. And Ms. Krasno also, in addition to 10 commenting on university posts, she also 11 tagged the university in her own posts; is 12 that correct? 13 A. Yes. 14 Q. Did -- had you received any complaints 15 about a post that Ms. Krasno tagged the 16 university in? 17 A. Yeah. I believe it was 18 September 2020, sorry. I believe it was 19 September -- around September 2020 where 20 Ms. Krasno had made a post complaining that 21 the university was untagging itself in -- in 22 her Instagram post. And I saw that, you know, 23 because we were tagged in that post, and so I 24 stopped untagging the university. 25 Q. Okay. So prior to her complaining</p>

<p>177</p> <p>1 about the tags being removed, were there any 2 complaints that you received about -- about 3 posts that she made where she tagged the 4 university? 5 A. I don't recall any others. 6 Q. Do you recall any complaints 7 from -- from anyone about any of Ms. Krasno's 8 social media activity interactions with the 9 university's social media? 10 A. Again, I don't recall any. This 11 was -- yeah, given the length of time ago, 12 I -- I don't recall. 13 Q. And as you testified earlier, if 14 Ms. Krasno or any other user tagged the 15 university in their own post, that would have 16 appeared on a separate page for the 17 university's Instagram account; is that 18 correct? 19 A. Yes. 20 Q. And if -- and if the tags are removed, 21 then those posts would no longer appear on the 22 university's Instagram page; is that correct? 23 A. Yes. That's correct. Although, the 24 post still exists. You know, it is -- it is a 25 different user's post.</p>	<p>179</p> <p>1 you know, that pattern, I would -- I would 2 restrict an Instagram account, like I did 3 Ms. Krasno's. Monitor the comments, you know, 4 in that period of restriction, see are they 5 continuing to display the same behavior of 6 making off-topic comments or comments that 7 violate one of the criteria in the social 8 media statement. 9 And -- and then, you know 10 every -- maybe every month, couple months, not 11 on a consistent basis. But, you know, after a 12 period of time if, you know, maybe didn't hear 13 from that user for a little while or they 14 displayed behavior that was -- that didn't 15 violate one of the criteria, it could be a 16 number of things, I would unrestrict the 17 accounts, just as like a fresh start. 18 As such I did with Ms. Krasno's 19 account in late January, because around the 20 same time that I just -- I kind of did 21 that -- that inbox cleanse and just, yeah, I 22 reviewed -- I reviewed many things within that 23 time in late January. 24 Q. Prior to removing Ms. Krasno from the 25 restricted account list, had you -- did you</p>
<p>178</p> <p>1 And I do want to clarify that if -- if 2 a user's account is -- is like locked or 3 private, and they tag, say, the university in 4 a photo of theirs, I don't believe it 5 will -- it will show up in the tagged section. 6 Q. Thank you for the clarification. 7 You -- Ms. Krasno's account was 8 un- -- was no longer restricted in January 9 of 2021; correct? 10 A. Correct. 11 Q. And can you describe the decision 12 to -- to loosen the restriction -- or to 13 remove the restriction on Ms. Krasno's account 14 in January of 2021? 15 A. Sure. As I, you know, did with 16 several other accounts on that kind of 17 display, the same pattern of consistent 18 off-topic comments or 19 consistently -- consistently violating 20 or -- or fitting one of the criteria in our 21 social media statement for grounds for 22 moderation, I used the Instagram tool 23 to -- the Instagram restriction tool just to 24 help with comment moderation. And I would, 25 you know, run through. And if I had found,</p>	<p>180</p> <p>1 have any concern about being sued over social 2 media moderation of Ms. Krasno? 3 A. By Ms. Krasno specifically? 4 Q. Yeah. By Ms. Krasno specifically. 5 A. I -- no, I don't believe so. 6 Q. Did you have any concerns 7 about -- about a lawsuit over the university's 8 social media moderation other than by 9 Ms. Krasno, by anybody? 10 A. Yeah. Generally, yes. 11 Q. Well, can you explain why -- why you 12 had that concern? 13 A. Yeah. So particularly over banning 14 users. So this -- I don't recall, you know, 15 when this conversation happened, but it was 16 sometime after -- I know that there 17 was -- there was a -- I don't know if it was a 18 federal lawsuit or a lawsuit where -- where 19 Donald Trump was sued as president for 20 blocking users on Twitter. But I read that as 21 social media in general, you know, blocking 22 users. 23 And it was found to be -- I forget the 24 specific terms of -- of the verdict, but found 25 to be that he couldn't block users on his</p>

<p>181</p> <p>1 social -- or on his Twitter account.</p> <p>2 And so that was -- that was certainly</p> <p>3 grounds for, you know, concern. You know, why</p> <p>4 that's -- why I would -- you know, yeah,</p> <p>5 display concern for, you know, sometimes</p> <p>6 university employees will come to me asking</p> <p>7 for advice about how to handle a specific</p> <p>8 instance or user or comment or what have you.</p> <p>9 And in -- in, you know, so many</p> <p>10 different ways, I might say, like, don't ban</p> <p>11 you -- you know, might be able to moderate the</p> <p>12 comment this way depending on the</p> <p>13 circumstances at hand.</p> <p>14 But generally speaking, yeah, blocking</p> <p>15 accounts -- an account level block ban was</p> <p>16 something that was on my radar as something</p> <p>17 that, you know, wouldn't be allowed. Sorry.</p> <p>18 I'm getting hoarse.</p> <p>19 Q. Getting towards the end of the day.</p> <p>20 Sorry.</p> <p>21 A. It's okay.</p> <p>22 Q. In the course of Ms. Krasno</p> <p>23 posting -- well, actually, let me take that</p> <p>24 back.</p> <p>25 Prior to removing the restrictions on</p>	<p>183</p> <p>1 something about lifting the veil on the</p> <p>2 section in her -- in her time working in the</p> <p>3 UW primate lab.</p> <p>4 And so I, you know, since it involved</p> <p>5 the primate lab, I -- I sent it to our -- some</p> <p>6 of our research communicators, just as a</p> <p>7 heads-up. And our research communicators</p> <p>8 in -- are still university communications.</p> <p>9 But I would consider them subject</p> <p>10 matter experts or beat writers is another way</p> <p>11 that I would describe them. Particularly one</p> <p>12 employee who handles -- or covers the topic of</p> <p>13 animal research as it relates to research</p> <p>14 communications.</p> <p>15 Q. And what was that -- what was that</p> <p>16 particular employee's name?</p> <p>17 A. Chris Barncard.</p> <p>18 Q. And what -- can you explain how -- how</p> <p>19 notifying -- Chris Barncard or</p> <p>20 anyone -- anyone else relating to the animal</p> <p>21 research subject matters at the university</p> <p>22 relates to your -- to your job description as</p> <p>23 a social media manager?</p> <p>24 A. Yeah. So social listening. That</p> <p>25 means monitoring, whether it is content</p>
<p>182</p> <p>1 Ms. Krasno's account in January 2021, had</p> <p>2 you -- had you spoken with anyone or heard</p> <p>3 from anyone at the university expressing</p> <p>4 concern about her -- Ms. Krasno's critical</p> <p>5 comments?</p> <p>6 MR. KILPATRICK: I'm going to object</p> <p>7 to the extent it calls for communication with</p> <p>8 UW legal counsel, and direct the deponent not</p> <p>9 to answer and expose those communications.</p> <p>10 BY MR. BERRY:</p> <p>11 Q. So answer the question, then, except</p> <p>12 with regards to legal counsel.</p> <p>13 A. Would you be able to repeat the</p> <p>14 question, please?</p> <p>15 Q. Yeah. Other than communications with</p> <p>16 legal counsel, did -- did you speak with</p> <p>17 anyone who worked for the university who --</p> <p>18 who expressed concern to you about</p> <p>19 Ms. Krasno's comments on the university's</p> <p>20 social media pages?</p> <p>21 A. I recall -- let's see. I recall there</p> <p>22 was a conversation we had where one of us saw</p> <p>23 that there was -- there was an event by a host</p> <p>24 and Ms. Krasno was the guest speaker. And I</p> <p>25 saw, like, the event description, I think</p>	<p>184</p> <p>1 created by the university or if it's about the</p> <p>2 university. I believe that fits my job</p> <p>3 description to, you know, listen or, you know,</p> <p>4 social listening, which means using your eyes</p> <p>5 to read.</p> <p>6 But as it relates to my job</p> <p>7 description, I, you know, I need to monitor,</p> <p>8 you know, how folks are talking about the</p> <p>9 university or, you know, media mentions</p> <p>10 or -- or what have you, and share it with</p> <p>11 various communicators as it relates to their</p> <p>12 field.</p> <p>13 Q. How often are you -- are you relating</p> <p>14 things that you -- that you listen to other</p> <p>15 people in the university?</p> <p>16 A. I would say almost on a daily basis.</p> <p>17 Q. And can you give a list of examples</p> <p>18 of -- of things that you've -- that you've</p> <p>19 relayed to other people in the university that</p> <p>20 you've seen on social media?</p> <p>21 A. Sure. So quite recently with</p> <p>22 the -- the Russia-Ukraine conflict, there's an</p> <p>23 office, it's CREECA, C-R-E-E-C-A, I forget</p> <p>24 exactly what the acronym stands for, but kind</p> <p>25 of like centrally European-Russian studies. I</p>

<p>1 think that's the -- part of the focus of that 2 department. 3 They were hosting a series of events 4 about Ukraine and whatnot. And I just sent as 5 a heads-up to several, you know, colleagues 6 that the event was happening, just because 7 the -- the topic in the news was so fresh. 8 Other times we might get a -- a big 9 social media mention or a mention or -- or are 10 the topic of a social media post by a -- an 11 account with a large following, which is 12 generally not worthy. 13 So I might, you know, send a heads-up, 14 a, hey, we might be -- we might see more 15 traffic on this outside of social media. 16 I'll usually send a heads-up to other 17 social managers if, like we discussed before, 18 PETA or, you know, an animal-related account 19 will be running a campaign. There -- because 20 there are, you know, various aspects involved 21 with that outside of social media. 22 So I'll usually notify Chris and/or 23 Kelly, Kelly Tyrrell, who is the research 24 communications director for the university 25 communications, and Chris reports to Kelly.</p>	<p>185 1 on -- on the university relation's website. 2 There are -- you know, a laundry list of, you 3 know, suggests to be timely and be responsible 4 in your communications and, you know, to not 5 represent the university in your, you know 6 work capacity or to make sure your -- you're a 7 good representative of the university. 8 Q. Do you -- how does that, protecting 9 the university's reputation, relate to how you 10 see your job function at the university? 11 A. I -- I see my role as, you know, one 12 of -- one of many -- but one of the essential 13 parts of the university's reputation so far as 14 I'm the main representative for the 15 university, and the main institutional 16 accounts on social media. 17 Q. Okay. Do you -- do you ever talk with 18 people involved in -- in, like, development or 19 fundraising or anything with the university? 20 A. Sorry. Can -- I -- I missed a word 21 you said in there. 22 Q. Oh, yeah. Do you -- do your job 23 duties involve ever talking with employees 24 involved in fundraising for the university as 25 it might relate to social media?</p>
<p>186 1 Those are a few examples. 2 Q. Do you have any sense of why it 3 matters what people are saying? Excuse me. 4 Let me rephrase the question. 5 Why does it matter to the -- what 6 people are saying about the university on 7 social media? 8 A. I work in the communications office 9 and -- and so we handle almost -- well, a 10 majority of the incoming and outgoing 11 messaging. But, you know, social media is 12 just one facet of -- of, you know, the media 13 landscape. 14 Oftentimes we'll receive emails, 15 calls, other forms of contact. And so it's 16 just important to keep a finger on the pulse 17 of, you know, any given topic. And, you know, 18 what's -- what's new or noteworthy or might 19 need to, you know, check with subject matter 20 experts on. 21 Q. Does the -- does the university's 22 reputation matter to the communications 23 department? 24 A. Yes. And particularly in the social 25 media guidelines in the university relations</p>	<p>187 1 A. Yes. 2 Q. And have any of those conversations 3 with university employees involved in 4 fundraising ever ventured to the topic of 5 animal research? 6 A. I -- I believe so. 7 Q. Can you -- can you describe the nature 8 of those conversations? 9 A. Yeah. I'm thinking of particularly, 10 you know, questions that might come my way in 11 regards to comments on a -- different 12 university offices, social media accounts that 13 are related to animal research. And they have 14 questions, you know, about those comments so 15 they come to me. 16 Q. What kind of comments would they have 17 questions about? 18 A. Oh, comments that might involve animal 19 research. 20 Q. Can you give an example? 21 A. I can't quote any verbatim. I -- I 22 don't recall specific comments. 23 Q. Okay. And would this be by an email, 24 Teams message? Like how would these -- how 25 would questions about these comments be</p>

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<p>189</p> <p>1 related to you?</p> <p>2 A. Could be either.</p> <p>3 Q. Okay. And do the comments ever relate</p> <p>4 to Ms. Krasno?</p> <p>5 A. I don't recall if they specifically</p> <p>6 mention Ms. Krasno or not.</p> <p>7 MR. BERRY: Can we mark UW0026 as</p> <p>8 the -- our next exhibit, put that on the</p> <p>9 screen?</p> <p>10 (Whereupon, Moll Deposition</p> <p>11 Exhibit No. 36 was marked</p> <p>12 for identification.)</p> <p>13 TECHNICIAN: 36.</p> <p>14 BY MR. BERRY:</p> <p>15 Q. Just take a moment it review that.</p> <p>16 Maybe scroll down to the bottom of the page,</p> <p>17 too.</p> <p>18 Are you familiar with this document?</p> <p>19 A. Yes, I am.</p> <p>20 Q. And what is this document, Exhibit 36?</p> <p>21 A. Sure. Would you be able to scroll</p> <p>22 back up to the top, please or at least include</p> <p>23 more of it?</p> <p>24 Yeah, that's great. Thank you.</p> <p>25 This is an email regarding a social</p>	<p>191</p> <p>1 university?</p> <p>2 A. All the time. I mean, there</p> <p>3 are -- this is a large university, and we have</p> <p>4 many events happening every day, many of which</p> <p>5 are promoted on social media.</p> <p>6 Q. And previously you testified that --</p> <p>7 that you'll share these types of events that</p> <p>8 people -- who they pertain to.</p> <p>9 But can you explain why -- why Kelly</p> <p>10 thought to inform you about it?</p> <p>11 MR. KILPATRICK: Objection; calls for</p> <p>12 speculation.</p> <p>13 BY MR. BERRY:</p> <p>14 Q. Do you have any idea why -- why Kelly</p> <p>15 thought you should know about this?</p> <p>16 A. I can't answer for Kelly. But I -- I</p> <p>17 see in the event description that it mentions</p> <p>18 University of Wisconsin Madison and social</p> <p>19 media.</p> <p>20 Q. What kind of monitoring would you do</p> <p>21 with regards to this event as part of your job</p> <p>22 duties?</p> <p>23 A. All right. Let me -- can I read the</p> <p>24 event description here?</p> <p>25 Q. Sure.</p>
<p>190</p> <p>1 media workshop, either lead or including</p> <p>2 Ms. Krasno.</p> <p>3 Q. And --</p> <p>4 A. Cohosting.</p> <p>5 Q. -- how often do you receive emails</p> <p>6 like this, about other people having events?</p> <p>7 A. How often do I receive emails about</p> <p>8 events?</p> <p>9 Q. Yeah. About events like this?</p> <p>10 A. Events like the one that Ms. Krasno</p> <p>11 was involved in?</p> <p>12 Q. Let me -- well, let me</p> <p>13 scratch -- scratch that.</p> <p>14 Do you see at the top of this email</p> <p>15 exchange it says that the sender is [as read]:</p> <p>16 "I'm copying Nate Moll who</p> <p>17 runs a number of our</p> <p>18 institutional accounts and</p> <p>19 also helps us monitor and</p> <p>20 respond to campaigns."</p> <p>21 Is that an accurate...</p> <p>22 A. That's accurate.</p> <p>23 Q. Yeah. How -- how often are you -- are</p> <p>24 you monitoring events that -- that other</p> <p>25 people are hosting that might relate to the</p>	<p>192</p> <p>1 A. So monitoring would include, you know,</p> <p>2 listening for -- or in the event description</p> <p>3 it describes, you know, using social media as</p> <p>4 part of our campaigns.</p> <p>5 And specifically in the first line</p> <p>6 under the first ellipses, we can still</p> <p>7 pressure labs to stop torturing animals.</p> <p>8 And we have seen campaigns like that</p> <p>9 in the past on social media. So I believe</p> <p>10 that's -- that's relevant to my line of work,</p> <p>11 to monitor.</p> <p>12 Q. Other than generally being aware of</p> <p>13 the events happening, is there any other kind</p> <p>14 of monitoring activity that -- that you did</p> <p>15 with regards to this event?</p> <p>16 A. This event specifically, I don't</p> <p>17 believe so.</p> <p>18 Q. Other than generally being aware that</p> <p>19 events are occurring, what kinds of monitoring</p> <p>20 activities would you go -- would you engage</p> <p>21 in, had you engaged in -- I can -- I can</p> <p>22 rephrase that so it's clear.</p> <p>23 What other monitoring activities have</p> <p>24 you engaged in for events that go beyond just</p> <p>25 being aware that the events are occurring?</p>

<p>193</p> <p>1 A. Depending on the event, I'll provide 2 event coverage or, you know, run replies from 3 our accounts. Excuse me. Or -- or interact 4 with -- with social media posts from an event. 5 Q. What do you mean by "event coverage"? 6 A. Sure. If I were to staff an event, 7 say a Badger football game, I, you know, will 8 staff the event in person and produce content 9 indirect with fans on social media or if this 10 were a chancellor speaking event, I might, you 11 know, in a similar fashion, produce content 12 for either the chancellor, you know, 13 recommended content for the chancellor or 14 primarily work through the UW-Madison social 15 channels to provide event coverage by 16 producing content or looking for content 17 produced by others, you know, that might 18 mention or be about the university in relation 19 to that event. 20 Q. Have you ever staffed any of 21 Ms. Krasno's events? 22 A. No, I have not. 23 Q. Have you ever -- have you ever staffed 24 any -- any events relating to animal research? 25 A. We did have -- this was a UW police</p>	<p>195</p> <p>1 and -- and campus utilities. 2 Q. With regards to moderating 3 Ms. Krasno's comments, the -- are there any 4 reasons, other than them being off topic, that 5 you've ever moderated her -- her account or 6 her comments on the university's social media 7 pages? 8 A. If -- I can't say for sure, but 9 generally speaking, you know, I did notice a 10 pattern of behavior of making off-topic 11 comments. I can't say that every comment that 12 was moderated would fit into that off-topic 13 criteria. There may be others, but generally 14 speaking, that is the pattern I noticed of 15 being off topic. 16 Q. Earlier we had -- let's see here. 17 Sorry. Just give me a second here. 18 MR. BERRY: Can we pull -- actually, 19 let's pull up Exhibit 20 again. 20 You know, actually, I wanted -- I 21 wanted 21. Sorry about that. Could we put 22 Exhibit 21 back up? 23 Can we scroll down to the bottom of 24 that? 25</p>
<p>194</p> <p>1 department -- it was like a tabletop exercise 2 as part of the American C [sic] Operations 3 Center or EOC [sic]. 4 And so as -- as part of my role, I 5 also hold a social media position within this 6 EOC organizational structure in a role very 7 similar to my -- my current role in university 8 communications. 9 And we did have a tabletop exercise 10 that involved animal research where we -- we 11 lost power at a campus -- or a part of campus 12 involving a research lab and needed to, you 13 know, go through the simulation as a training, 14 how to handle that -- that scenario. And 15 that -- that EYPD scenario involved animal 16 research in -- in that way, in that 17 hypothetical scenario. 18 Q. Was the -- was the emergency just 19 related to securing the animals or was 20 it -- was there like a -- was there like a 21 criminal component to the -- to the exercise? 22 A. No, I -- I think it was a -- like a 23 storm scenario where like a -- either a storm 24 or a tornado ripped through campus and lost 25 power to, you know, various buildings</p>	<p>196</p> <p>1 BY MR. BERRY: 2 Q. This is the -- the interim guidelines 3 that we talked about from May 2021. And it 4 says at the bottom there as we discussed that 5 [as read]: 6 "To the extent users post 7 on-topic content that is 8 inaccurate, misleading or 9 critical of University of 10 Wisconsin Madison, social 11 media managers may respond 12 either with a reply or a 13 separate post." 14 Do you remember that, and go on to 15 that -- the part of the -- the interim 16 guidance? 17 A. Yes, I do. 18 Q. Is -- is there any -- -- is it your 19 view that Ms. Krasno -- that her content is 20 inaccurate, misleading or critical? 21 A. I would consider it critical. As for 22 inaccurate or misleading, I -- I would need to 23 do more research or consult a subject matter 24 expert. 25 Q. Have you ever -- have you ever</p>

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<p>197</p> <p>1 moderated a comment from -- from Ms. Krasno 2 because you thought it was inaccurate, 3 misleading, or critical? 4 A. There may have been a situation like 5 that. I -- I can't recall a specific 6 instance, but it may have happened. 7 Q. And have you ever -- have you 8 ever -- have you ever replied or -- or 9 responded to Ms. Krasno for any -- any content 10 based on it being inaccurate, misleading, or 11 critical? 12 A. I don't recall any specific replies or 13 responses, but again, it -- it may have 14 happened at some point. 15 MR. BERRY: We can -- we can put the 16 exhibit down. 17 BY MR. BERRY: 18 Q. Earlier I had asked if you had staffed 19 any of Ms. Krasno's events. Do you know if 20 anyone from the university has ever staffed 21 any of her events? 22 A. Not that I'm aware of. 23 Q. Okay. 24 MR. BERRY: I hate to do this, but can 25 we actually bring Exhibit 21 back up? I</p>	<p>199</p> <p>1 BY MR. BERRY: 2 Q. And are you familiar with this 3 document, which is exhibit -- actually, if 4 you -- is this 37 that we're on? 5 A. I'm familiar with that. 6 Q. Okay, yeah. Yeah. For Exhibit 37 7 here, can you -- do you recognize this 8 document? 9 A. Yes, I do. 10 Q. And what is it? 11 A. This is a screenshot of UW-Madison's 12 Instagram privacy and security settings as 13 they relate to comment filtering with the list 14 of keyword filters. 15 Q. Okay. And there are a number of words 16 here, including a few that are profanity. But 17 would you -- would you agree that -- that many 18 of the words, such as animal testing, testing 19 cats, testing on animals, torture, 20 vivisection, W-N-P-R-C, for example, are -- 21 are not profanity? 22 A. I would not consider those profanity, 23 no. 24 Q. So can you explain that -- why -- why 25 those words would be in the auto-moderation</p>
<p>198</p> <p>1 didn't realize it would be the next one. 2 BY MR. BERRY: 3 Q. On -- on Exhibit 21 here there's a 4 section heading, auto moderation. And it says 5 [as read]: 6 "Social media managers may 7 use platform and/or 8 computer-based tools to 9 auto moderate the use of 10 profanity. Social media 11 managers are using auto 12 moderation tools to filter 13 content other than 14 profanity. Please have 15 them contact Rachel Jeris 16 or Craig Fischer in OLA." 17 Do you acknowledge that's what the 18 exhibit says? 19 A. Yes, it does. 20 Q. And can we -- can we now go to -- add 21 a new exhibit? This will be file UW0145. 22 (Whereupon, Moll Deposition 23 Exhibit No. 37 was marked 24 for identification.) 25</p>	<p>200</p> <p>1 list, despite not being profanity? 2 A. The -- these words or phrases were 3 likely added for -- in relation to those types 4 of spam campaigns that I've described several 5 times where they can completely inundate and 6 overwhelm me or a social media manager. 7 And so if they see a -- a commonly 8 repeated word or phrase within those spam 9 campaign comments, they will -- and -- and 10 need to -- you know, require the use of the 11 auto moderator for help in just content 12 management, I will add that order phrase to 13 this list. 14 Q. Is that -- to the best of your 15 knowledge, are -- are these words still -- 16 still on the list, or has the list changed 17 since this document was produced? 18 A. I haven't looked at the list recently. 19 I don't recall. I don't know when this 20 screenshot was taken. 21 Q. Do you remember -- do you remember 22 making any significant modifications to the 23 keyword filters, I guess at any time since the 24 lawsuit was filed? 25 A. Oh, since the lawsuit. I don't recall</p>

<p>201</p> <p>1 specific instances of -- of removing words 2 there -- there may have been words that 3 removed, or words or phrases. 4 But I don't keep any documentation 5 outside of an example of what you're seeing 6 here. 7 The only list of words that exists -- 8 words or phrases that exist is within the 9 Instagram or Facebook settings themselves. 10 Q. Did you ever discuss 11 these -- these -- sorry. 12 With -- without describing the content 13 of any of these conversations that may have 14 occurred, did you ever -- did you ever discuss 15 the keyword auto moderator filters for the 16 social media accounts with Ms. Jeris or 17 Mr. Fischer as -- as prompted by the interim 18 social media guidelines? 19 A. As there is guidance in the 20 interim -- in the interim guidance, it -- it 21 was probably covered in our conversations. I 22 don't recall specific conversations or the 23 contents. 24 Q. Okay. I got -- you know, just -- 25 MR. BERRY: How do people feel about,</p>	<p>203</p> <p>1 I don't anticipate this will be a lot longer, 2 maybe -- maybe 20 minutes or so. 3 Can we pull up Exhibit -- I think it 4 was 37? This is the Instagram keyword filter. 5 BY MR. BERRY: 6 Q. With regards to Exhibit 37 here, 7 Mr. Moll, I -- -- several of these comments 8 relate to -- just to animals or animal 9 research-related terms? 10 Would you agree with that? 11 A. Yes. 12 Q. And, you know, it's also a relatively 13 short list. I mean, we could count them up. 14 But it looks like there's maybe a dozen or two 15 words total. 16 I was wondering if you could explain 17 why -- why so much of this comment filtering 18 list are -- are terms relating to animals and 19 animal research? 20 A. Sure. I'd say that the fast majority 21 of the spam-style campaigns that we receive 22 are related to animal testing. And that's 23 typically where I require the -- the 24 assistance of the auto moderator to handle 25 those types of comments, you know, where they</p>
<p>202</p> <p>1 like a five-minute break, and then resuming 2 what I anticipate to be a fairly short 3 completion? 4 I know it's -- it's 5:00, and I don't 5 want to drag this out too long. But would it 6 be okay just to break for -- for five minutes 7 and come back for a little bit more? 8 MR. KILPATRICK: That's fine with me. 9 THE WITNESS: That's fine. 10 MR. BERRY: Okay. 11 VIDEOGRAPHER: And we're going off the 12 record. The time is 4:59. 13 (A short recess was had.) 14 VIDEOGRAPHER: The time is 5:06. 15 We're on the record at the start of recording 16 5. 17 MR. KILPATRICK: I just got something 18 quick. 19 MR. BERRY: Mm-hmm. 20 MR. KILPATRICK: Craig Fischer, he had 21 to leave and drop off the call. And Rachel 22 Jeris has come in the call in his place. You 23 may recognize that name. She's with the UW 24 office, legal counsel. 25 MR. BERRY: Sounds good. Thanks. And</p>	<p>204</p> <p>1 have a, you know, consistently using a keyword 2 or phrase. 3 Q. Okay. So it's a -- so this -- okay. 4 Do -- do other -- other topics 5 generate a lot of comments as well, other than 6 animal research? 7 A. Topics... 8 Q. Sorry. Would you say -- are there 9 other -- are there other -- other issues that 10 generate a large number of off-topic comments, 11 besides animals used in research? 12 A. There have been in the past, but not 13 with the -- the frequency as animal research 14 campaigns do. 15 Q. You said -- okay. 16 MR. BERRY: Can we -- can we go to 17 file UW0144, which actually, I believe this is 18 the accidentally -- I had accidentally 19 designated this as Exhibit 27, I think. 20 Somewhere -- somewhere in that area. Did I 21 actually get that right? 22 Is that Exhibit 27? 23 TECHNICIAN: Yes, sir. 24 MR. BERRY: Oh, good. No business 25 remembering that exactly, but, great.</p>

Transcript of Nate Moll
Conducted on March 9, 2022

52 (205 to 208)

<p>205</p> <p>1 BY MR. BERRY:</p> <p>2 Q. Mr. Moll, can you describe what this</p> <p>3 Exhibit 27 is?</p> <p>4 A. Yes. This is a screenshot of the</p> <p>5 UW-Madison Facebook page settings. And the</p> <p>6 settings relate to page moderation where it</p> <p>7 contains a list of words or phrases on the</p> <p>8 auto moderated list.</p> <p>9 Q. And can we -- and are -- are you</p> <p>10 familiar with this -- with this page and these</p> <p>11 settings shown on Exhibit 27?</p> <p>12 A. Yes, I am.</p> <p>13 MR. BERRY: Can we zoom in a little</p> <p>14 bit, actually?</p> <p>15 BY MR. BERRY:</p> <p>16 Q. And so what happens when a comment</p> <p>17 contains one of these words made to the</p> <p>18 university's Facebook posts?</p> <p>19 A. If a comment containing one of these</p> <p>20 words or phrases is made on a UW-Madison</p> <p>21 Facebook post, it's similar to Instagram</p> <p>22 hidden from -- you know, the comment is</p> <p>23 hidden. It's still visible to the user and</p> <p>24 any friends -- Facebook friends of -- of that</p> <p>25 commentor.</p>	<p>207</p> <p>1 Q. And, for example, on the third line of</p> <p>2 the blocked keywords there's one phrase of</p> <p>3 "blue lives matter."</p> <p>4 Do you see that phrase? It's been</p> <p>5 added to the moderator.</p> <p>6 A. Yes, I do.</p> <p>7 Q. Do you remember -- do you remember the</p> <p>8 circumstances that led you to add -- add that</p> <p>9 phrase to the list?</p> <p>10 A. Generally, yes.</p> <p>11 Q. And in general, what can you -- can</p> <p>12 you sort of describe the -- the circumstances</p> <p>13 behind adding blue lives matter to the list of</p> <p>14 moderated words?</p> <p>15 A. Yeah. There was a -- an issue related</p> <p>16 to -- let's see. Gosh, sorry.</p> <p>17 There was a photo taken in our</p> <p>18 university police department with various, you</p> <p>19 know, police officers and university PD staff.</p> <p>20 And that photo contained, I believe it was a</p> <p>21 wall hanging or a wall decoration with, it's a</p> <p>22 stylized American flag with one blue stripe</p> <p>23 as, you know, to -- to signify, you know, like</p> <p>24 a police officer if you're familiar with</p> <p>25 that -- that emblem.</p>
<p>206</p> <p>1 Q. Okay. And -- and do you manage the</p> <p>2 words that appear on this list?</p> <p>3 A. I am the point person, yes, for this</p> <p>4 list.</p> <p>5 Q. And did you add any of the words</p> <p>6 relating to animals and research that appear</p> <p>7 on this list?</p> <p>8 A. I would -- I would assume that I did,</p> <p>9 yes, add some of these words or phrases</p> <p>10 relating to animals.</p> <p>11 Q. Are you -- are you aware of any other</p> <p>12 words that -- that have been added to this</p> <p>13 list, subsequently to the creation of this</p> <p>14 document?</p> <p>15 A. No, I'm not.</p> <p>16 Q. And does the grouping of the word say</p> <p>17 anything about when they were added?</p> <p>18 For example, are the ones -- are the</p> <p>19 ones at the top the most recently or -- or</p> <p>20 added or -- or the oldest ones, alternatively?</p> <p>21 Is there any -- is there any sort of logic to</p> <p>22 the order that they appear?</p> <p>23 A. I don't believe so. Just by looking</p> <p>24 at some of these, I don't think there's any</p> <p>25 logic to the organization of these.</p>	<p>208</p> <p>1 And we received many, many comments on</p> <p>2 a wide array of Facebook posts that included</p> <p>3 the blue lives matter phrase.</p> <p>4 Q. Were the --</p> <p>5 (Indiscernible simultaneous</p> <p>6 colloquy.)</p> <p>7 BY MR. BERRY:</p> <p>8 Q. Finish.</p> <p>9 A. Yeah. To the point where I -- I</p> <p>10 required the assistance of the auto moderator</p> <p>11 to help handle those comments.</p> <p>12 Q. And were those comments, you know, in</p> <p>13 favor of blue lives matter or in opposition to</p> <p>14 the -- to that statement or otherwise?</p> <p>15 A. I -- I don't know if I could say for</p> <p>16 sure.</p> <p>17 Q. Okay.</p> <p>18 A. There were many, many comments. So I</p> <p>19 can't group them all as one.</p> <p>20 Q. And in -- were those blue lives matter</p> <p>21 comments appearing on posts other than the</p> <p>22 police department post?</p> <p>23 A. Were -- sorry. Could you rephrase</p> <p>24 that?</p> <p>25 Q. Yeah. You -- you said that there</p>

<p>209</p> <p>1 was -- there was a picture, right, from the 2 police department that was -- that had college 3 people to start saying that? 4 A. Oh, yeah. That photo of the police 5 department was not shared by the UW- -- at 6 UW-Madison accounts. It was -- it was from a 7 different source. 8 Q. Okay. Have you ever -- have you ever 9 moderated a word -- words or phrases 10 associated with -- with like -- with 11 racial diversity or racial inclusion? 12 STENOGRAPHER: I'm sorry. What was 13 it? 14 BY MR. BERRY: 15 Q. In support of racial adversity or -- 16 or racial equity? 17 A. Have I ever moderated a word relating 18 to racial diversity or equity? 19 Q. Yeah. 20 A. I'm not sure I understand the scope of 21 the question. It -- it's possible. I'm not 22 sure. 23 Q. Okay. Do you -- looking at this list 24 in front of you, do you see any terms that 25 are -- any terms or phrases that are -- that</p>	<p>211</p> <p>1 would add black lives matter, if it became a 2 word -- a phrase that was being used 3 frequently off topic on social media posts? 4 A. It's possible. But I do want to point 5 out that there are other reasons or criteria 6 beyond being on or off topic for -- for which 7 a word or phrase can be added to this list. 8 Q. That's a -- yeah, I understand that. 9 But I just want to be clear that that is your 10 view that black lives matter could be added to 11 the auto-moderation keyword filter if -- if a 12 lot of people were using that phrase in an 13 off-topic way on soc- -- on the university's 14 social media post; is that correct? 15 A. It -- it could, yes. 16 Q. Okay. Have you ever considered doing 17 that? 18 A. I don't recall any considerations. 19 Although, they could have occurred at some 20 point in time. 21 Q. Is that -- is that a phrase that is 22 often used off topic on social media posts for 23 the university? 24 A. I'm not sure we have received a lot of 25 comments, and I -- I'm not sure.</p>
<p>210</p> <p>1 are related to -- to, you know, promoting 2 diversity, equity, and inclusion? 3 A. I see a phrase "all lives matter." I 4 also see "China virus" and "Chinese virus." 5 Q. Can you say those phrases are -- are 6 promote -- promote diversity, equity, and 7 inclusion? 8 A. Those phrases alone, I -- it's tough 9 to determine based on just those phrases 10 alone. 11 Q. Okay. So they might be related to 12 promoting diversity, equity, and inclusion, 13 you don't know? 14 A. They -- they might. It's -- it's 15 context dependent. 16 Q. Okay. Would it -- would it be your 17 position that it would be appropriate to add, 18 for example, black lives matter to this list 19 if that -- if that was a phrase that was 20 commonly being used off topic? 21 A. If it was a phrase being used very 22 often, and the comments were off topic, there 23 could be grounds to adding it. 24 Q. So potent- -- so you're -- so what 25 you're testifying is that potentially you</p>	<p>212</p> <p>1 Q. And you said you've been the social 2 media specialist or manager since 2013? 3 A. Correct, July 2013. 4 Q. And you don't -- you don't remember a 5 time where -- where people would be posting 6 black lives matter, for example, on -- on 7 this -- off-topic social media posts by 8 university? 9 A. Well, we -- we have -- and the 10 university has posted about the black lives 11 matter movement on social media as, you know, 12 event coverage and -- and support for our 13 diversity, equity, and inclusion initiatives. 14 So at -- I would say that typically we 15 would not add a word or phrase to an auto 16 moderated list for topics that we do post 17 about on our Facebook and Instagram accounts. 18 There may certainly be caveats to that, as I 19 do use the auto moderator tool to assist 20 with -- with handling, you know, volumes of 21 comments. 22 But typically speaking, we -- I stick 23 to words or phrases that we would not cover 24 within the scope of the UW-Madison Facebook 25 and Instagram accounts.</p>

<p>213</p> <p>1 Q. Does the university social media 2 account ever -- ever post about research that 3 the university is doing that -- that relies on 4 animal research?</p> <p>5 A. It's -- it's possible, yes.</p> <p>6 Q. So that being the case, would 7 that -- would that render comments about 8 animal research to be on topic in general, 9 then, be -- if there were some posts relating 10 to -- to research that the university 11 was -- was doing that involved animal 12 research?</p> <p>13 A. If that specific post by the 14 university was about animal research, then a 15 comment involving animal research would be on 16 topic.</p> <p>17 Q. Okay. So it's still -- it's -- the 18 comment has -- hasn't pertained to the 19 specific post any -- even if a subject is 20 frequently posted about the comment still has 21 to pertain to that specific post?</p> <p>22 A. Correct. In -- in determining whether 23 it's on or off topic. But there -- there are 24 other criteria that I take into consideration.</p> <p>25 Q. Well, are there ever times where an</p>	<p>215</p> <p>1 MR. BERRY: Can we -- this might be my 2 last topic here. Can we go to designate 3 UW0695? And that would be -- I think it's the 4 Exhibit 38 that we're on now. But let 5 me -- maybe if you could just let's us know 6 what that -- what the exhibit is or -- or show 7 it when it comes up.</p> <p>8 TECHNICIAN: You're correct again, 9 sir. Exhibit 38.</p> <p>10 (Whereupon, Moll Deposition 11 Exhibit No. 38 was marked 12 for identification.)</p> <p>13 BY MR. BERRY:</p> <p>14 Q. And do you recognize this post?</p> <p>15 A. Yes. This is a screenshot of a 16 Microsoft Teams chat thread with the social 17 media managing team.</p> <p>18 Q. Okay. And can you describe 19 what -- what the conversation is about in this 20 Exhibit 38?</p> <p>21 A. This jumps into -- or this 22 is -- appears to be the middle of a 23 conversation. Let's see. But this is a 24 conversation about comments on an Instagram 25 post.</p>
<p>214</p> <p>1 off-topic comment can -- that you would keep 2 an off-topic comment on -- on a post, even 3 though it is off topic?</p> <p>4 A. Yes. Whether I -- you know, might not 5 see it, it's -- you know, maybe sometimes 6 made, you know, after the fact.</p> <p>7 Yeah, it's oftentimes circumstantial 8 of, you know, the workload of myself or 9 whoever is moderating comments at the time as, 10 you know, social media is -- it never sleeps.</p> <p>11 The office doesn't close at 5:00 p.m. 12 or the accounts don't close at 5:00 p.m. like 13 offices sometimes do. You know, social media 14 posts are living documents.</p> <p>15 Q. So except for situations where 16 somebody doesn't notice a comment or 17 does -- you know, doesn't have time to address 18 it, are there other reasons where you would 19 notice a comment that's off topic and decide 20 to keep it anyways?</p> <p>21 A. I'm sure there are. I -- I can't put 22 my finger on any specific reasons.</p> <p>23 Q. Would that just be up to the 24 discretion of the moderator, then?</p> <p>25 A. Yes.</p>	<p>216</p> <p>1 Q. And those comments are -- are relating 2 to a -- to Cornelias; is that correct?</p> <p>3 A. Yes.</p> <p>4 Q. What is -- what is Cornelias, and why 5 is that being -- why is that being discussed?</p> <p>6 A. Cornelias is the -- the name of one of 7 the primates involved with research at the 8 university.</p> <p>9 Q. And you said that you added it to the 10 auto moderator?</p> <p>11 A. Yes, I believe. Yeah, I said that, or 12 it was a -- yeah.</p> <p>13 Q. And why -- why did you add that 14 Cornelias to the auto moderator?</p> <p>15 A. A -- based on this conversation, it 16 appears that we were receiving many comments 17 relating to Cornelias on a commencement video, 18 and -- and a comment -- and if I -- if I 19 recall correctly for that campaign, there were 20 comments to release Cornelias. And a comment 21 just stating release Cornelias would be off 22 topic on a commencement video.</p> <p>23 Q. Do you -- so you said in this thread 24 that you added Cornelias to the auto 25 moderator.</p>

<p>217</p> <p>1 Do you recall a time where you ever 2 went through those auto moderated comments to 3 decide whether to -- to unhide ones 4 that -- that happen to be on topic for future 5 posts? 6 A. Sorry. Could you restate the 7 question? 8 Q. Yeah. Were there any instance where 9 you reviewed posts that were hidden for having 10 Cornelias to determine whether to unhide those 11 terms -- those comments? 12 A. Oh, I see. Yes, you know, I will 13 review the hidden comments caught by the auto 14 moderator to see if it's working as intended 15 to catch those spam-style comments that have 16 nothing to do with, in this case, a 17 commencement video. 18 But, yeah, I do check especially for, 19 you know, recently added words or phrases to 20 make sure that they are working as intended, 21 that they're only catching those that I can 22 determine in a bulk sense. 23 So I look for keywords or phrases that 24 are repeated over and over and over to add to 25 the auto-moderated list.</p>	<p>219</p> <p>1 the one to add that laughing emoji to that 2 comment? 3 A. I don't recall if I added a laughing 4 emoji to that. 5 Q. So it -- do you -- is there any reason 6 that that -- that you find that funny? 7 MR. KILPATRICK: Objection; 8 mischaracterizes the testimony of the 9 deponent. 10 BY MR. BERRY: 11 Q. You can answer the question. 12 A. I don't know why that would be funny. 13 We're just talking about a -- another -- or 14 a -- yeah, another spelling of -- of a -- of a 15 name. 16 Q. So would you -- would you be surprised 17 if I told you that you were the one who put 18 that smiling emoji there? 19 A. I -- I don't recall that -- ever doing 20 it. I -- I'm in the conversation, but, yeah, 21 I'm not sure. 22 Q. But would you be surprised if I told 23 you that you were the one who put that smiling 24 emoji to that comment? 25 A. I don't know if I would be surprised.</p>
<p>218</p> <p>1 Q. Do you remember any specific instance 2 where you -- were you actually did unhide a 3 comment that had -- that had Cornelias in it? 4 A. I don't recall a specific one. 5 Although, it may have happened before. 6 Q. So it might have happened, but you 7 don't have any specific memory of it ever 8 happening? 9 A. Not a specific memory. 10 Q. Do you have a vague or a general 11 memory of having unhidden -- the Cornelias 12 comment? 13 A. No. I -- I don't remember. 14 Q. And I also see some -- someone had 15 posted another variant Corneliois that's at 16 the bottom there. Do you see that? 17 A. Yes. 18 Q. And there -- there was a laughing 19 emoji. Can you -- can you explain what 20 the -- I don't know what -- why someone would 21 have found that comment funny? 22 MR. KILPATRICK: Objection; 23 speculative. 24 BY MR. BERRY: 25 Q. Did you -- did -- did you -- were you</p>	<p>220</p> <p>1 Q. Okay. So you're -- so you're saying 2 you don't know -- you wouldn't be surprised if 3 you had put the smiling emoji, but you also 4 don't know why that would be funny? 5 A. Well, and -- and I can't speak for the 6 person who made that -- another variant in the 7 spelling, variant spelling of Cornelias. 8 I'm also not sure what time of year 9 this conversation took place. But 10 as -- as -- so in -- in the social media group 11 chat if you will, we, you know, have -- had 12 been dealing with many stressful situations 13 with, you know, more and more variants 14 and -- and just COVID variants and how they 15 related to university operations and, you 16 know, continuing the pandemic. 17 And so I guess in -- in, yeah, I can 18 see how this comment, you know, another 19 variant. You know, as more and more variants 20 were popping up in, you know, the news and as 21 they affected all of us, you know, it -- it -- 22 I might have found that funny at the time just 23 in the way it was phrased, focusing on -- on 24 another variant. But I -- that's -- I -- I'm 25 not sure.</p>

<p>221</p> <p>1 Q. Okay. We -- I --</p> <p>2 MR. BERRY: I guess this would be</p> <p>3 maybe more for Steven. We might -- we</p> <p>4 might -- I might request the -- I'm sure</p> <p>5 there's a way to figure out who did that</p> <p>6 smiley, so just a heads-up. But we</p> <p>7 would -- if we do, if we could get -- if we</p> <p>8 can, would you get a request for that?</p> <p>9 MR. KILPATRICK: Okay. Noted.</p> <p>10 MR. BERRY: It's just for preservation</p> <p>11 purposes that I mention that.</p> <p>12 Can we pull up -- let's see -- can we</p> <p>13 do -- can we pull up and designate as</p> <p>14 exhibit -- UW0703?</p> <p>15 (Whereupon, Moll Deposition</p> <p>16 Exhibit No. 39 was marked</p> <p>17 for identification.)</p> <p>18 BY MR. BERRY:</p> <p>19 Q. And are you familiar with this</p> <p>20 document?</p> <p>21 A. Yes, I am.</p> <p>22 Q. Can you describe it?</p> <p>23 A. This is a screenshot of a Microsoft</p> <p>24 Teams chat involving the social media</p> <p>25 communicators group chat.</p>	<p>223</p> <p>1 And so given the circumstance where</p> <p>2 we're being completely inundated by comments</p> <p>3 within our Instagram account for this -- this</p> <p>4 Cornelias campaign which is, to be quite</p> <p>5 honest, very stressful, personally speaking.</p> <p>6 And so this -- this comment on -- in</p> <p>7 particular, "release the Cornelias," you know,</p> <p>8 I immediately see flowers in my mind.</p> <p>9 And given the stressful circumstance,</p> <p>10 you just need to take a quick step back and,</p> <p>11 you know, remind yourself that -- to breathe</p> <p>12 and -- and that, you know, I think this was</p> <p>13 just the same moment of finding a -- a spark</p> <p>14 of a smile in what was otherwise a very</p> <p>15 stressful point in time.</p> <p>16 Q. Okay. Do you have -- we can -- we</p> <p>17 don't need that exhibit anymore.</p> <p>18 Do you -- I mean, what -- what are</p> <p>19 your personal feelings on the -- on that</p> <p>20 Cornelius campaign?</p> <p>21 A. The campaign in general?</p> <p>22 Q. Yeah.</p> <p>23 A. I -- I don't -- I mean, I know it</p> <p>24 exists. I -- I didn't look too far into the</p> <p>25 merits of the campaign. I knew that it was</p>
<p>222</p> <p>1 Q. Okay. And you do see there's a -- I</p> <p>2 think it looks -- Kelly T. Maybe we can zoom</p> <p>3 in on that, on Exhibit 39 here. Zoom in on</p> <p>4 the Kelly T. comment. There's a screenshot.</p> <p>5 Someone says [as read]:</p> <p>6 "Release the Cornelias."</p> <p>7 Do you see that, that screenshot that</p> <p>8 was shared in the chat?</p> <p>9 A. Yes, I do.</p> <p>10 Q. And you responded a couple of comments</p> <p>11 down [as read]:</p> <p>12 "Probably my favorite</p> <p>13 comment of the year right</p> <p>14 there."</p> <p>15 A. Yes, I did.</p> <p>16 Q. Can you explain what the -- what you</p> <p>17 mean by that?</p> <p>18 A. Sure. So the -- if you can zoom back</p> <p>19 in to the screenshot that Kelly T. shared, it</p> <p>20 says [as read]:</p> <p>21 "Release the Cornelias."</p> <p>22 And cor- -- a Cornelia is a type of</p> <p>23 flower. And given my -- my educational</p> <p>24 background, I focused a lot in botany. I'm</p> <p>25 familiar with the Cornelia flowers.</p>	<p>224</p> <p>1 for a -- you know, specific-named primate in a</p> <p>2 UW research facility. But I didn't do much</p> <p>3 research into the -- the campaign itself.</p> <p>4 Q. Well, how do you feel about Cornelias,</p> <p>5 aside from the campaign?</p> <p>6 That's the monkey that's in the</p> <p>7 research laboratory. Do you think things</p> <p>8 about the -- about Cornelias?</p> <p>9 A. I don't really have a personal opinion</p> <p>10 on it.</p> <p>11 All right. I'm just going to, quick,</p> <p>12 turn a light on. It's getting kind of dark in</p> <p>13 my office with the sun going down. Okay.</p> <p>14 MR. BERRY: This is going to be</p> <p>15 the -- can we pull up...</p> <p>16 BY MR. BERRY:</p> <p>17 Q. Well, actually, was there -- does the</p> <p>18 university never entirely turn off comments on</p> <p>19 its -- any of its Instagram or Facebook posts?</p> <p>20 STENOGRAPHER: I'm sorry?</p> <p>21 BY MR. BERRY:</p> <p>22 Q. Is there ever a time where the</p> <p>23 university turns off comments entirely for its</p> <p>24 Instagram or Facebook posts?</p> <p>25 A. There had been instances of that</p>

<p>225</p> <p>1 happening, yes.</p> <p>2 Q. And under what circumstances would</p> <p>3 the -- would you decide to disallow comments</p> <p>4 on an entire post?</p> <p>5 A. Yeah. That happens very seldom.</p> <p>6 There are -- there have been several instances</p> <p>7 of turning off comments on individual posts.</p> <p>8 Just -- I think due to the nature of the</p> <p>9 comments and -- and it was just unserviceable</p> <p>10 as a social media manager or in times of, you</p> <p>11 know, like over the holidays if we're just</p> <p>12 very short staffed and -- and we don't really</p> <p>13 have staffing to keep eyes on the accounts.</p> <p>14 There was an instance this past</p> <p>15 holiday season where we turned off comments on</p> <p>16 our moments in time, that's that</p> <p>17 photographer -- photographer's choice year in</p> <p>18 review where, yeah, I -- I needed to take some</p> <p>19 time off and there was nobody else to fill in</p> <p>20 for me, so, yeah.</p> <p>21 Q. Okay. And, yet, if -- if comments are</p> <p>22 blocked, that would mean that -- that even if</p> <p>23 someone -- even if someone posted something</p> <p>24 that was on topic, it would be automatically</p> <p>25 blocked from appearing on the post; is that</p>	<p>227</p> <p>1 and -- [indiscernible] -- saying [as read]:</p> <p>2 "Our -- our goal is an</p> <p>3 environment of decency,</p> <p>4 quality and mutual respect</p> <p>5 for all human beings and</p> <p>6 all other creatures"...</p> <p>7 Is that correct?</p> <p>8 A. Yes.</p> <p>9 Q. And would -- would comments about</p> <p>10 animal research be on topic or off topic for</p> <p>11 this post?</p> <p>12 A. Well, I -- I can't speak for all</p> <p>13 comments. You know, it -- I would need to</p> <p>14 look at the contents of the comment.</p> <p>15 But for mentioning all other creatures</p> <p>16 that they could be considered on topic.</p> <p>17 Q. And -- and I don't see any comments on</p> <p>18 this post; that -- that's correct?</p> <p>19 A. Correct.</p> <p>20 Q. Would -- was this one of the posts</p> <p>21 where comments were disabled?</p> <p>22 A. Yes.</p> <p>23 Q. And why -- why were comments disabled</p> <p>24 for this post?</p> <p>25 A. Yeah. I -- I -- I don't recall. This</p>
<p>226</p> <p>1 correct?</p> <p>2 A. They're just -- if -- if you turn off</p> <p>3 a comment section, there's just no ability to</p> <p>4 post a comment.</p> <p>5 Q. Okay.</p> <p>6 MR. BERRY: Can I have you -- okay.</p> <p>7 This will be the last exhibit, and then we'll</p> <p>8 be done.</p> <p>9 Can we pull up the April 22, 2020,</p> <p>10 file and mark that as an exhibit.</p> <p>11 (Whereupon, Moll Deposition</p> <p>12 Exhibit No. 40 was marked</p> <p>13 for identification.)</p> <p>14 TECHNICIAN: This is marked as</p> <p>15 Exhibit 40.</p> <p>16 BY MR. BERRY:</p> <p>17 Q. And on Exhibit 40, do you</p> <p>18 recognize -- are you -- sorry, excuse me.</p> <p>19 This exhibit is marked 40. Are you</p> <p>20 familiar with this document?</p> <p>21 A. Yes, I am.</p> <p>22 Q. And what is it?</p> <p>23 A. This is a screenshot of a UW-Madison</p> <p>24 Instagram post about Earth Day.</p> <p>25 Q. Okay. So it mentions Earth Day,</p>	<p>228</p> <p>1 was -- you know, this was what, April 2020.</p> <p>2 So that was a little while ago. But as I</p> <p>3 recall, there were many, many comments that it</p> <p>4 just -- it turned very ugly. You know,</p> <p>5 as -- as with -- as oftentimes comes with</p> <p>6 animal research-type comments, there are</p> <p>7 threatening comments in there as well about,</p> <p>8 you know, burning in hell with so many</p> <p>9 different expletives and -- and, you know</p> <p>10 comments of -- of that nature or wishing harm</p> <p>11 upon researchers or -- or people just at the</p> <p>12 university.</p> <p>13 And looking at -- you know, this is</p> <p>14 April 2020, which, you know, that was very</p> <p>15 early into the COVID-19 pandemic. And this</p> <p>16 was an incredibly stressful time to</p> <p>17 be -- well, anyone for that matter.</p> <p>18 But especially, you know, as -- for</p> <p>19 in my opinion, a social media manager. And so</p> <p>20 I believe, you know, at that time I didn't</p> <p>21 have the mental capacity to just handle those</p> <p>22 types of comments.</p> <p>23 Q. Do you remember about -- do you</p> <p>24 remember how many comments there were before</p> <p>25 you turned the commenting off?</p>

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<p>229</p> <p>1 A. I don't.</p> <p>2 Q. Could you even -- could you even</p> <p>3 hazard to guess in a ballpark how many</p> <p>4 comments there were before you turned it off?</p> <p>5 A. This is so long ago, I -- I don't</p> <p>6 know.</p> <p>7 Q. Would those -- would those comments</p> <p>8 have been preserved anywhere or would they be</p> <p>9 viewable through your account administrator</p> <p>10 access on the page?</p> <p>11 A. I don't think so.</p> <p>12 Q. Okay. All right.</p> <p>13 A. I don't think so.</p> <p>14 MR. BERRY: All right. I'm done with</p> <p>15 my questions.</p> <p>16 MR. KILPATRICK: I just have one. And</p> <p>17 it's just a very quick clarifying one about an</p> <p>18 answer to a question, Christopher, you had</p> <p>19 posed.</p> <p>20 I'm going to ask that an exhibit be</p> <p>21 placed back up on the screen. I think it's</p> <p>22 25.</p> <p>23 Could you scroll down a bit so we</p> <p>24 could see the top?</p> <p>25 Sorry, other way. Yeah.</p>	<p>231</p> <p>1 MR. BERRY: Yeah. Plaintiff will do</p> <p>2 that.</p> <p>3 MR. KILPATRICK: And Defendant, too,</p> <p>4 but we'll just need electronic and condensed</p> <p>5 version, please, with exhibits.</p> <p>6 MR. BERRY: Yeah. I'll have the same</p> <p>7 way that Steven -- Steven wanted it.</p> <p>8 Whatever we did last week, I kind of</p> <p>9 want to do for this one. Yeah, we can just do</p> <p>10 the regular speed for now, and I'll contact</p> <p>11 you if we want it faster.</p> <p>12 * * * FURTHER DEPONENT SAITH NOT * * *</p> <p>13 (Proceedings ended at 5:57 p.m.)</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>
<p>230</p> <p>1 Okay.</p> <p>2 EXAMINATION</p> <p>3 BY MR. KILPATRICK:</p> <p>4 Q. All right. Mr. Moll, do you remember</p> <p>5 testifying about this?</p> <p>6 A. Yes, I do.</p> <p>7 Q. And what is this again?</p> <p>8 A. This is a screenshot of an Instagram</p> <p>9 comment section on a UW-Madison Instagram</p> <p>10 post.</p> <p>11 Q. Okay. So it was -- it's Instagram and</p> <p>12 not Facebook?</p> <p>13 A. Correct.</p> <p>14 MR. KILPATRICK: Okay. That's all I</p> <p>15 needed to know is.</p> <p>16 VIDEOGRAPHER: Is there anything else</p> <p>17 to put on the record or shall we go off?</p> <p>18 MR. BERRY: We can go off the record.</p> <p>19 MR. KILPATRICK: Yeah. I've got</p> <p>20 nothing further.</p> <p>21 VIDEOGRAPHER: Okay. The time is</p> <p>22 5:55. We're off the record at the end of</p> <p>23 recording 5.</p> <p>24 STENOGRAPHER: And would anyone like</p> <p>25 to order the transcript?</p>	<p>232</p> <p>1 STATE OF ILLINOIS)</p> <p>2) SS:</p> <p>3 COUNTY OF COOK)</p> <p>4 I, ANGELA C. LOISI, CSR, RPR, FCRR, an</p> <p>5 Officer of the Court, do hereby certify that</p> <p>6 heretofore, to wit, on March 9, 2022,</p> <p>7 virtually appeared before me, from Cook</p> <p>8 County, Illinois, NATE MOLL, in a cause now</p> <p>9 pending and undetermined in the United States</p> <p>10 District Court for the Western District of</p> <p>11 Wisconsin, wherein MADELINE KRASNO is the</p> <p>12 plaintiff, and BOARD OF REGENTS OF THE</p> <p>13 UNIVERSITY OF WISCONSIN is the defendant.</p> <p>14 I further certify that the said witness</p> <p>15 acknowledged his testimony to be true under</p> <p>16 the penalties of perjury in the cause</p> <p>17 aforesaid; that the testimony then given by</p> <p>18 said witness was reported stenographically by</p> <p>19 me in the virtual presence of the said</p> <p>20 witness, and afterwards reduced to digital</p> <p>21 format by Computer-Aided Transcription, and</p> <p>22 the foregoing is a true and correct transcript</p> <p>23 of the testimony so given by said witness as</p> <p>24 aforesaid.</p> <p>25 I further certify that the signature to</p>

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1 the foregoing deposition was waived for the
2 respective parties.

3 I further certify that the taking of this
4 deposition was pursuant to notice, and that
5 virtually present at the deposition were the
6 attorneys hereinbefore mentioned.

7 I further certify that I am not counsel
8 for nor in any way related to the parties to
9 this suit, nor am I in any way interested in
10 the outcome thereof.

11 IN TESTIMONY WHEREOF: I have hereunto set
12 my verified digital signature on
13 March 9, 2022.

14

15

16

17

18 *Angela C. Loisi*

19 _____
20 Angela C. Loisi, CSR, RPR, FCRR

21

22

23

24

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